



| AML Policy

1. Introduction

FXLINK Co.,Ltd hereafter (“FXLINK Corporation”), maintains the current policy with the purpose to prohibit and prevent money laundering and terrorist financing. This commitment includes not only the direct laundering of money but and any activity that facilitates money laundering as well as the funding of terrorist or criminal activities.

Money laundering is:

(i)the concealment or maintenance of confidentiality of the true nature, origin, location, manner of disposal, relocation, the right of ownership of assets deriving from crime or of other assets acquired in the place thereof, as well as of other rights relating to such assets;

(ii)the conversion, transfer, acquisition, possession or use of assets deriving from crime or of assets acquired in the place thereof, the purpose of which is the concealment or maintenance of confidentiality of the illicit origin of the assets or assisting a person who has participated in a criminal activity in order to enable such a person to avoid the legal consequences of his or her action.

Financing of acts of terrorism is financing or supporting an act of terrorism, including allocation or raising of funds to plan or perform acts, which are deemed to be acts of terrorism, or to finance the operations of terrorist organisations or in the knowledge that the funds allocated or raised will be used for the aforementioned purposes.

FXLINK Corporation is committed to preventing any money laundering activities by applying certain principles when establishing business relationships and customer transactions, including any transactions intermediated by agents in cases where certain functions have been delegated to third parties.

FXLINK Corporation is constantly monitoring its level of exposure to the risk of money laundering and financing of terrorism. FXLINK Corporation AML Policy is designed to ensure that all staff complies with the requirements and obligations set out in applicable legislation, regulations, rules, and Industry Guidance for the financial services sector, including the need to have adequate systems and controls in place to mitigate the risk of the firm being used to facilitate financial crime.

2. Due diligence measures

In order to prevent money laundering or terrorist financing through FXLINK Corporation, all managers and employees whose duties include the establishment of business relations or conclusion of transactions shall implement specific due diligence measures. These measures are implemented for the purposes of transparency and reliability of the commerce of FXLINK Corporation and their implementation helps to reduce the counter-party and reputation risks and to increase the credibility of the financial sector.

1.At least the following due diligence measures are followed by FXLINK Corporation when conducting business:

(i) identifying and verifying the identity of a client or a party of a transaction;

- (ii) identifying and verifying the identity and right of representation of a representative of a natural or a legal person;
- (iii) identifying the actual beneficiary;
- (iv) identifying the purpose and nature of business relations and transactions;
- (v) constantly monitoring business relations, regularly verifying and updating the data used for identification and, if necessary, identifying the source and origin of the funds used in a transaction;
- (vi) detecting suspicious accounts and report them to appropriate supervisory personnel;
- (vii) maintaining an adequate audit trail that would allow competent authorities to trace all transactions that pass through FXLINK Corporation in case of an investigation;

The above list is only indicative and FXLINK Corporation may implement additional measures from time to time to comply with the applicable regulations.

2.2. FXLINK Corporation shall implement due diligence measures at least in the below circumstances: (i) upon establishing business relations/account opening;

(ii) upon carrying out one-off transactions involving a sum of over 10,000 US dollars or equivalent in any other currency, irrespective of whether the financial obligation is fulfilled with one payment or with multiple connected payments;

(iii) upon suspicion of money laundering or terrorist financing, irrespective of any derogations, exceptions or thresholds provided for by law;

(iv) upon suspicion of insufficiency or falseness of any documents or data collected earlier during identification of a person and verification of presented information or updating the corresponding data.

2.3. On applying due diligence measures FXLINK Corporation may apply simplified or enhanced due diligence requirements. Implementation of enhanced due diligence requirements shall be triggered, inter alia, by the following circumstances:

(i) the places of business or the place of residence and/or seat of the representative and the principal are located in different jurisdictions;

(ii) the authorization (except for a statutory right to represent a legal person) has been issued for a term of over one year;

(iii) large transactions (transaction amount over 10,000 US Dollars) and complex transactions; transactions that deviate significantly from the previous normal transaction history of the person;

(iv) transactions involving large asset transfers to a country that is not the known home country of the person;

(v) the social appearance and behavior, personal financial situation or other circumstances surrounding the person are irregular considering the characteristic features of the transaction to be concluded or the business of the principal;

(vi) Classification of the person as PEP or any other category directly classified by the legislation as high risk.

Under no circumstances (and subject to any provisions otherwise specified by FXLINK Corporation), will a client be permitted to open and maintain an account or place orders until the account has been approved and the client has reasonably demonstrated its identity as specified in this Policy.

3. The extent of implementation of due diligence measures (risk analysis)

1. The extent of implementation of due diligence measures shall be determined by FXLINK Corporation in consideration of the nature of the transaction or the risk level of the party to transaction/operation.

2. If there is no requirement to implement enhanced due diligence measures or no grounds for implementing simplified due diligence measures, a manager or employee of FXLINK Corporation shall implement general due diligence measures.

3. The assessment of the risk of money laundering and terrorist financing shall include assessment of geographic risk, client risk, and risk associated with the transaction or operation.

4. Identification of Clients

1. Identification of natural persons or a representative of a legal person for the purposes of identification will take place with the presentation of one of the following documents:

(i) ID card;

(ii) passport;

(iii) a valid driving license, including the name, photograph or facial image, signature or image of the signature, and date of birth or personal identification code of the holder;

(iv) a valid travel document (passport) issued in a foreign country;

(v) a diplomatic passport;

(vi) a seafarer's discharge book;

(vii) an alien's passport;

Once the above documentation is collected, a manager or an employee of FXLINK Corporation shall record the following details of the natural person:

(i) name of the person and name of the representative (if any);

(ii) personal identification code or, if unavailable, time and place of birth;

(iii) address of the person's actual place of residence;

- (iv) the person's profession or area of activity;
- (v) name and number, date of issue, and the name of the issuing authority of the document presented for identification and verification of identity;
- (vi) in case of a foreign resident, the fact whether he or she is a person having a state background by asking the client to provide relevant information and, if necessary, verifying it via available databases (e.g., Internet search engines);
- (vii) the telephone number and email address.

4.2. Legal persons shall be identified by identifying the legal form, objectives of activities, profile, legal capacity, members of management bodies of the legal person, using the procedure specified in this section, as well as any representatives and the basis, extent, and term of their authorization.

A manager or employee of FXLINK Corporation shall record the following information regarding that legal person, based on the submitted identification document or, if necessary, additional requests for information:

- (i) name of the manager or names of the members of the management board or other body substituting for a management board, and their authority in representing the legal person;
- (ii) area of activities and principal place of business;
- (iii) numbers of communication mean;
- (iv) data of the actual beneficiaries of the legal person;
- (v) in case a person having a foreign state background is associated with the legal person, the information on that person having a state background shall be recorded by asking the client to provide relevant information and, if necessary, verifying it via public databases (e.g., Internet search engines).
- (vi) Articles of Incorporation

5. Due diligence measures in conclusion of transactions

1. In order to implement due diligence measures, a manager or an employee of FXLINK Corporation shall collect information on the business activities of the client and on the purpose and nature of the particular planned transaction or operation.

2. The client's activity profile shall be determined during the establishment of the client relationship considering, inter alia, nature, regularity, volume and other relevant factors pertaining to the transactions of the client. This shall be done, as required, by requesting from the client additional information and/or documents, using other legal options for obtaining information on the client, analyzing the client's previous payment patterns, and implementing other suitable and reasonable measures depending on circumstances. In case of a legal person, the objectives of its activities and, if possible, the main business partners shall be identified.

5.3. Electronic orders may not be executed automatically, without a prior analysis according to the procedure specified herein.

6. Monitoring of client relationships and updating of personal data

1.FXLINK Corporation shall continuously monitor the circumstances associated with the business activities of a client, including transactions concluded, regularly verify the details used for identification, update any relevant documents and data and, if necessary, identify the source and origin of the funds used for the transaction.

2.Clients shall be categorized according to current relevant data on the nature and prevalence of measures and methods used for money laundering and terrorist financing and any potential changing trends in such circumstances.

3.The due diligence requirement shall be fulfilled by conducting an analysis of client transactions to detect any anomalies in the client's transactions, which deviate from the client's profile of operations and could be indicative of characteristics of money laundering or terrorist financing in the client's behavior.

4.Any suspicious transactions shall be assessed separately to determine any possible links of the transactions or funds used to money laundering or terrorist financing.

7. Data Storage

1.FXLINK Corporation shall store all the data below in a form allowing reproduction in writing (in writing as files or electronically in the servers):

(i) documents required for identification of the natural and legal person and registered data;

(ii)documents and data collected for verifying a representative's right of representation and for identifying and verifying the actual beneficiary;

(iii) data collected and compiled in connection with a transaction;

(iv)notifications received from the managers and employees regarding suspicious and unusual transactions, as well as information collected for analyzing such notifications and other related documents;

(v)information on the circumstances of withdrawing from business relationships or refusing to conclude a transaction and circumstances of terminating the business relationship;

(vi)notification submitted to the competent authorities together with the time of submission and details of the submitting employee.

7.2. In case of a change in personal data, the identification document used as a basis for amendment of personal data, the time and place of amendment of personal data and the details of the employee who amended the client's data or verified the submitted data or documents shall be registered in a form allowing reproduction in writing.

7.3. Any data collected in the course of implementing due diligence measures for prevention of money laundering and terrorist financing (incl. data collected for identification and verification of identity, transaction data and data on transmitted notifications) shall be stored for at least five years after termination of the contractual relationship with the respective client or conclusion of the transaction/operation in a systematic form and in a manner that enables quick finding of such data and submissions to competent authorities.

8. Training of Employees

1.FXLINK Corporation shall provide all its employees with information on the obligations arising from AML/TF legislation, procedures for the performance of such obligations and shall arrange for additional training as required.

2. The training includes at least the following content:

- (i) FXLINK Corporation’s commitment to the prevention, detection, and reporting of ML and TF crimes.
- (ii) Examples of ML and TF, to create an awareness of the potential ML and TF risks
- (iii) Well known or recognized typologies, especially where made available by the AML Supervisors.
- (iv) The consequences of ML and TF for FXLINK Corporation, including potential legal liability.
- (v) The responsibilities of FXLINK Corporation under the AML Regulations.
- (vi) Those particular responsibilities of employees as identified in this AML Policy, and how employees are expected to follow the procedures.
- (vii) How to identify and report unusual activity that may be a suspicious transaction or attempted transaction.
- (viii) The rules that apply against unlawful disclosure of suspicious transactions (“tipping off”)

9. Delegation of Duties

1.FXLINK Corporation shall have the right, for better performance of its obligations related to business activities, to delegate a part of the obligations arising from legislation and this policy to third parties.

2.If obligations are delegated to third parties, the training requirements specified in this policy shall be applicable to such third parties and the third parties shall, in performing the duties associated with prevention of money laundering and terrorist finance, comply with the applicable requirements.

3.When selecting the third parties, establishing legal relationships with them and monitoring their activities, FXLINK Corporation shall rely on relevant legislation and the internal rules of procedure for delegation of activities.

10. Reporting of Transactions

1. Clients should be aware of the fact that the collected data by FXLINK Corporation will become available to the competent authorities of the country of the company's incorporation and/or the country of origin or destination of funds.
2. FXLINK Corporation reserves the right to decline processing any funds if it believes to be connected in any way with any criminal activities or due to missing required documentation.
3. FXLINK Corporation is obliged to report suspicious transactions to the competent authorities and is prohibited for disclosing to the client that such a report has been filed.
4. Clients should be aware that the misuse of the account may result in criminal prosecution.
5. FXLINK Corporation will not maintain relationships in the case where the funds originate from criminal activities of any nature.

11. Conclusions

1. This document is only a policy which outlines the main obligations in relation to the Money Laundering and Terrorist Financing Regulations as amended from time to time.
2. Information is provided to the clients through this policy in relation to the factors that are taken into consideration by the management when establishing relationships. Also, the policy is reviewed periodically by FXLINK Corporation and the clients are informed accordingly in relation to any material changes.