



ANTI-MONEY LAUNDERING COMPLIANCE POLICY



Xeodis
PRECISION TRADING

AML COMPLIANCE POLICY

- 1.** The Company's trading services involve monetary transactions. That being so, the Anti-Money Laundering (AML) Compliance Policy is established by the Company to maintain a lawful business operation.
- 2.** In compliance with this policy, the Company will sift unlawful activities such as financial fraud, tax evasion, embezzlement, terrorist financing, and other operations that involve concealing illegally obtained money. The Company conducts regular risk assessments to identify and evaluate the potential money laundering and terrorist financing risks associated with its business operations. The risk assessment takes into account factors such as customer profiles, geographical locations, transaction volumes, and product offerings. Based on the risk assessment findings, appropriate risk mitigation measures are implemented.
- 3.** The Company keeps a record of Client transactions and reserves the right to reject the provision of these records to any individual or entity if it seems fit. Client records can be used to identify the Client's competence to use the Company's services, including but not limited to risk levels and criminal records.
- 4.** The Company monitors its customer base and transactions on an ongoing basis to detect any unusual or suspicious activities. This includes monitoring transaction patterns, conducting periodic reviews of customer information, and screening customers against relevant sanctions lists and watchlists.
- 5.** The Client understands and accepts that the Know-Your-Customer (KYC) Verification Policy is integral to this policy, and the Client's data may be used to detect and prevent illegal money operations. The Company may cooperate with the relevant authorities if the Client is deemed or proven involved in unlawful activities.
- 6.** In cases where clients present a higher risk, such as politically exposed persons (PEPs) or clients from high-risk jurisdictions, enhanced due diligence measures will be applied.
- 7.** Obtained data will be used to audit Internal Revenue Service (IRS) and Suspicious Transaction Reports. The Company's internal audit includes a code of conduct to identify Clients in countries without adequate AML regulations.
- 8.** If the Client's risk level is low, the Company may simplify its measures but will not entirely disregard its AML procedures. On the other hand, the Company can apply additional verification measures to Clients with a high-risk level.
- 9.** If a third party intends to perform transactions on behalf of the Client, a power of attorney is required, subject to the Company's approval.
- 10.** The Company can refuse to enter into transactions with anonymous third parties. The Company has the right to waive operations and transactions with any user who does not provide sufficient information or documentation.

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Trading derivatives on margin and utilizing leverage carries substantial risks, which may result in gains or losses. Prior to engaging in trading activities, it is essential to carefully evaluate your trading goals, experience level, and risk tolerance. There is a possibility of sustaining significant losses, potentially exceeding your initial investment. Therefore, it is crucial not to invest funds that you cannot afford to lose. All users are strongly advised to thoroughly read and comprehend the associated risks before participating in trading activities.

11. The following cases are taken into account to prevent illegal financing operations and to identify if the Client has a higher risk level:

- a)** Identify the Client's risk from his/her occupation's field, including its legal form and management structure, and whether the Client is involved in a civil law partnership or trust fund.
- b)** Identify the Client's country of jurisdiction and if it is included in a low tax-rate community or if the illegal financing regulations are not minutely enforced.
- c)** Consider countries that cooperate with criminal organizations or countries that are used to pursue unlawful operations.
- d)** Tighten verification measures if the Client's transactions seem unusual or economically impracticable, including, but not limited to, constant change of information, a rapid increase of capital, and rendering services to anonymous third parties.
- e)** Tighten measures for Clients with backgrounds of developing weapons related to mass destruction, including participating in operations with cash plays such as currency exchange locations and gambling operations.

12. In case the individual has a limited legal capacity, the Company will evaluate the individual's conditions and whether he/she can still access the Company's services. If the Client becomes unable to perform in critical conditions, the Company can immediately terminate any business relationship.

13. The Company is committed to maintaining a robust AML Compliance Policy to prevent its platform from being exploited for illicit financial activities. All employees are expected to adhere to this policy and play their part in upholding the highest standards of integrity and compliance.

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