AML POLICY





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1 Introduction

1.1. The Company upholds its integrity by observing regulations under the Anti-Money Laundering ("AML") Policy. This Policy intends to filter illegal activities, including securities fraud, terrorist financing, and other unlawful acts related to concealing the origin of illegally obtained money.

2 AML Law Compliance

- 2.1. In compliance with the respective financial regulations, the Company conducts authentication and verification procedures for the Client's identification. Therefore, the Client must provide the required documents to complete the process and comply with the Policy. Additionally, the Company collects a record of the Client's documents and transactions for security purposes.
- 2.2. All transactions performed through the Company's official Website or the corresponding banks and financial institutions are correlatively documented and recorded for security purposes.
- 2.3. In compliance with the AML Policy, the AML Compliance Committee executes Suspicious Activity Reports (SARs) and other mandatory disclosures to the respective legal administration in writing.
- 2.4. The Company and its workforce are committed to preventing money laundering and all other unlawful activities. Accordingly, the Company's business division undergoes risk-based methods judiciously estimated to filter and identify the relevant reporting under the International Anti-Money Laundering Law.

3 Company Responsibilities

- 3.1. The Company is unwavering in its public responsibility to avertillegal misconduct. The Company and its workforce strictly observe the verification practices and are strictly vigilant to prevent further and control risks that can affect the Company's operations.
- 3.2. The Company will always be informed about any national and global occurrence of initiatives to prevent further terrorism funding, money laundering, tax evasion, and other legal financing activities. The Company justifies the protection of its organizational operations, personal records of employees and Clients, and all forms of documents confidential in nature. Any threat related to illegal financing activities will deal with legal proceedings.
- 3.3. As part of the Company's AML act, politically exposed persons ("PEP") must not use or access the Company's services. PEPs include:
 - a. Individuals who are or have been entrusted with prominent public positions in any country with substantial authority over Policy, operations, or the use or allocation of government-owned resources

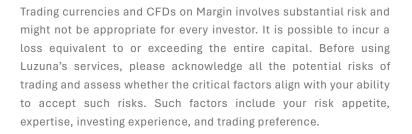
Trading currencies and CFDs on Margin involves substantial risk and might not be appropriate for every investor. It is possible to incur a loss equivalent to or exceeding the entire capital. Before using Luzuna's services, please acknowledge all the potential risks of trading and assess whether the critical factors align with your ability to accept such risks. Such factors include your risk appetite, expertise, investing experience, and trading preference.



- b. A foreign state
- c. Any public organization
- d. Immediate and other family members of a politician
- e. Close relationships or associates of a politician
- f. Joint beneficial ownership of a legal entity or arrangement with the main PEP
- g. Sole beneficial ownership of a legal entity or arrangement that is known to exist for the main PEP's benefit
- 3.4. Clients deemed or proven involved in any unlawful activities that violate the AML act will be reported to the relevant authorities without prior notice.

4 Client Eligibility

- 4.1. Identity verification includes but is not limited to the provision of the Client's:
 - a. Complete name and address
 - b. Date of birth
 - c. Passport number and country of issuance
 - d. Other Client information that the Company may request as part of the Company's Know-Your-Customer ("KYC") Policy
- 4.2. The Company's clients, executives, and employees must comply with the Anti-Money Laundering law. Accordingly, the relevant KYC documents must be provided and completed to verify the Client's identity and sift any unlawful financial activities.
- 4.3. Other than those indicated on the KYC policy document, the Client accepts that the Company may request additional documents and information when necessary.







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