

4XHUB EU LIMITED

(Regulated by the Cyprus Securities & Exchange Commission)

Anti-Money Laundering Policy

Original Issue Date	May 2023
Approver	Board of Directors
Last review	July 2023
Next review	May 2024
Version	Version 2

Table of Contents

1. Introduction	2
2. Anti-Money Laundering Provisions Framework	2
3. Account opening procedure	3
4. Account Opening Document Requirements	3
a. Proof of Identity	3
b. Proof of Residence	3
c. Bank Account Requirements	3
d. Legal person as a client	3
5. Anti-Money Laundering Policy Details	4
6. Funds Deposit Procedure	4
7. Funds Withdrawal Procedure	4
8. AML Compliance Footnote	5
9. Monitor And Review	5
10. Client Consent	5

1. Introduction

This Anti-Money Laundering Policy is intended to safeguard **4XHUB EU LIMITED** (hereinafter the “**Company**”), a legal entity duly incorporated and registered in the Republic of Cyprus under the registration number HE 419115 with registered office at Amathountas Avenue 210, Energy House, Block A, Office 1, Pyrgos, 4534, Limassol, Cyprus. The Company is licensed and regulated by the Cyprus Securities and Exchange Commission (hereinafter “**CySEC**”) as a Cyprus Investment Firm (or “**CIF**”) with CIF licence number 437/23 to offer the Investment and Ancillary Services and Activities specified in the Terms and Conditions under the Law which provides for The Provision of Investment Services, the Exercise of Investment Activities, the Operation of Regulated Markets and Other Related Matters L.87(I)/2017, as subsequently amended from time to time (“**the Law**”).

The Client acknowledges that the Company’s official language is English and our communication with you will be in English. Any other language will be used for convenience purposes only.

2. Anti-Money Laundering Provisions Framework

At the Company we are committed to prevent any activity that promotes Money Laundering or Terrorist Financing Activities. These provisions require that the Company management and personnel follow specific standards that prevent the use of our products and services for Money Laundering, following the Prevention and Suppression of Money Laundering and Terrorist Financing Law - Law 188(I)/2007 as amended from time to time (hereinafter the “**AML Law**”) and the provisions of the CySEC’ Directive of 2020 for The Prevention of Money Laundering and Terrorist Financing (hereafter the “**AML Directive**”), other Directives and Circulars issued by the CySEC.

Money laundering means actions intended to conceal or mask the criminal origin of the income and exchange for money or other assets that are 'clean'.

Anti-money laundering procedures mean that the Company requests that its Clients present respective documents confirming their identity and from where the money credited to the trading account opened with the Company to purchase services has come.

If the Client of the Company is a legal entity, then such a Client shall provide the Company with the documents confirming its legal incorporation under the law of the country where the legal entity is a resident.

Fulfilling its obligations under these Provisions, the Company has established the following mandatory rules for all Clients:

When crediting funds to the trading account, the name of the sender shall fully correspond to the name indicated during the registration of the Personal Account. *Payments from third parties are not allowed.*

The Company shall closely monitor suspicious actions and transactions and inform controlling bodies of such actions in a timely manner.

In compliance with the Company’s requirements to check a Client’s identity the Client shall confirm his/her name, personal data, and address with legally valid documents, upon request.

The Company is not authorized to and is not obliged to determine whether the identity document, provided by the Client, is legal. However, in the case that it is evident that the information obtained does not correspond to that required the Company may require that the Client provides additional documents to establish his/her identity. In the event that the Client refuses to provide the required information, as and when requested, or attempts to mislead Company’s employees, the Company may refuse to render services to such a customer.

If the Company finds any signs of suspicious activities that may be related to money laundering,

information thereof shall be communicated to the competent bodies.

3. Account opening procedure

Prior to opening a trading account, the Company shall collect and validate proof of identity, proof of residence, nature of business, income, net wealth, the anticipated account turnover, the nature of the transactions, the expected origin of incoming funds to be credited in the account, the expected destination of outgoing transfers/payments, source of funds, and investment objectives of each prospective Client.

4. Account Opening Document Requirements

a. Proof of Identity

The following are acceptable forms of photo identification:

- i. Valid passport
- ii. Valid National Identity Card

The document must be valid and issued on your name and all information on the document including your photo must be visible.

b. Proof of Residence

The following are acceptable forms of proof of residence:

- i. Bank Statement
- ii. Governmental documents such as tax bill or residence certificate (stamped)
- iii. Utility Bills (except for mobile phone bills)

All proof of residence documents must be recent (not older than 6 months), show your name, permanent address, date of issue and name and/or logo of the company / bank / authority that issued the document.

Please keep in mind that your Proof of Identity and Proof of Residence must be always kept up to date.

We must be able to understand the language shown on your Proof of ID and Proof of Residence. Please provide an English translation of your documents so that we can verify your identity.

The Company reserves the right, at any time, to request additional documents as deemed necessary e.g., information on origin and source of funds, financial status, experience, education and to verify the identity of the Client by using electronic verification.

c. Bank Account Requirements

All the Company's trade account holders must have a valid bank or credit / debit card account in their name. The bank statement should show their name, IBAN and the same registered address as their application.

d. Legal person as a Client

In case of a Client legal person that requests the establishment of a business relationship or the execution of an occasional transaction with the Company before establishing a business relationship or executing an occasional transaction the Company shall verify the ownership structure and the identity of the natural persons who are the Beneficial Owners and / or control the legal person. The Company shall identify the persons who have the ultimate control over the legal person's business and assets.

For the verification of the identity of the legal person, the Company shall request and obtain, among others, original or certified true copies of the following documents:

- i. certificate of incorporation and certificate of good standing (where available) of the legal person
- ii. certificate of registered office
- iii. certificate of directors and secretary
- iv. certificate of registered shareholders in the case of private companies and public companies that are not listed in a Regulated Market of an EEA country or a third country with equivalent disclosure and transparency requirements
- v. memorandum and articles of association of the legal person
- vi. a resolution of the board of directors of the legal person for the opening of the account and granting authority to those who will operate it
- vii. in the cases where the registered shareholders act as nominees of the Beneficial Owners, a copy of the trust deed/agreement concluded between the nominee shareholder and the Beneficial Owner, by virtue of which the registration of the shares on the nominee shareholder's name on behalf of the Beneficial Owner has been agreed
- viii. documents and data for the verification of the identity of the persons that are authorized by the legal person to operate the account, as well as the registered shareholders and Beneficial Owners of the legal person

Where deemed necessary for a better understanding of the activities, sources and uses of funds / assets of a legal person, the Company shall obtain copies of its latest management accounts.

5. Anti-Money Laundering Policy Details

The Company reserves the right to refuse processing a transaction at any stage where it believes the transaction to be connected in any way to money laundering or criminal activity. In accordance with international law, the Company is not obligated to inform the Client if suspicious activity is reported to any corresponding regulatory or legal bodies.

The Company monitors funding from various bank accounts outside of the account holder's home country.

The Company neither accepts cash deposits nor disburses cash under any circumstances.

The Company does not accept third-party deposits of any kind.

The Company matches each deposit to the account name on file for that customer.

6. Funds Deposit Procedure

The deposit procedure of the Company detailed below follows the strict principle that ensures funds are received from the bank account or credit / debit card, issued on Client's name bearing the same address, confirmed during onboarding.

The first payment of the operations is carried out through an account opened in the customer's name with a credit institution operating and licensed in a country in the European Economic Area or third country, which is categorized by the Company as lower risk after taking into account the Joint Guidelines and the Appendix II of the AML Law.

7. Funds Withdrawal Procedure

The withdrawal procedure of the Company detailed below follows the strict principle that ensures funds are securely remitted back to their originating source.

Funds may be withdrawn only through the same payment method they were deposited to the trading account. When transferring funds from the Client's Trading Account to banking account(s) or to accounts in an

electronic payment system, this transaction may not be performed unless the name of the addressee corresponds in full with the name indicated in the registration form for a personal trading account at the Company.

The Company's Clients will be able to make withdrawal funds electronically by logging in to their trading accounts.

The withdrawal request will be received directly to the Back Office department for processing. The Company's Anti Money Laundering Compliance department reviews all withdrawal requests approved by the Back Office department, verifying that the original funds are being withdrawn through the same method of deposit and to the name of the account holder on file.

The Anti Money Laundering Compliance department will also examine the withdrawal request against the customer's deposit history to ensure there is no suspicious activity, and if none verifies the bank account details held on file. If a withdrawal is flagged for suspicious activity, the withdrawal is placed on hold, pending further investigation by the Company's AMLCO and the Management.

The Company's AMLCO will decide if further action is needed and which, if any, relevant regulatory bodies need to be contacted.

8. AML Compliance Footnote

The compliance procedure related to Anti-Money Laundering listed above is a brief summary of the compliance function guidelines followed by the Company's Anti Money Laundering Compliance Department. A detailed copy of our Prevention of Money Laundering & Terrorist Financing Manual ("*AML Manual*") is available for qualified institutions, regulatory bodies, and related counterparties. No substitutions or modifications will be accepted to the requirements above. The Company's Anti Money Laundering Compliance Department reserves the final determination regarding the validity of these documents.

Clients should assume that all information provided to the Company is available to the competent regulatory authorities in

- i. the country of incorporation of the Company, i.e., the Republic of Cyprus;
- ii. the country of origin of any funds transmitted to the Company; and
- iii. the destination country of any funds refunded by or withdrawn from the Company.

The Company does not want your business if your funds are sourced from criminal activities or if the nature of your account transactions is illegal in any manner whatsoever.

Our AML Policy is a policy, part of our Terms and Conditions and is contractually binding.

9. Monitor And Review

The Company reserves the right, on a regular basis, to monitor and assess the effectiveness of this Anti-Money Laundering Policy and/or amend it at its sole discretion whenever it deems fit or appropriate. The Company will review the Policy at least annually. A review will also be carried out whenever a material change occurs that affects the ability of the Company to continue to provide the best possible services to its Clients.

10. Client Consent

The Company is required, when establishing a business relationship with the client, to obtain his / her prior consent to this Policy.