

# AML and KYC policy

## Anti-Money Laundering (AML) and Know Your Customer (KYC) Policy

Swissone Group Ltd has developed an Anti-Money Laundering and counter terrorism financing Policy (“AML/CTF Program”), in an effort to maintain the highest possible compliance with applicable laws and regulations relating to anti-money laundering. This includes, but is not limited to:

- Establishing robust internal policies, procedures and controls that combat any attempted use of Lexatrade for illegal or illicit purposes and that are designed to ensure our customers basic protections under consumer protection laws;
- Maintaining comprehensive records of orders and other transfers;
- Executing Know Your Customer (“KYC”) procedures on all customers;
- Performing regular, independent audits of our AML/CTF Program;
- Following record retention requirements; and Implementing a formal and ongoing compliance training program for all new and existing employees.

## Policies And Procedures

Our AML/CTF Program is regularly reviewed and, if necessary, revised in an effort to comply with applicable rules, regulations and policies.

## Internal Controls

We have developed robust internal policies, procedures, and controls designed to comply with applicable AML/CTF laws and regulations, as well as other reporting requirements.

## Training

All of our employees and officers receive ongoing broad-based AML/CTF training, as well as position-specific training. They must repeat this training at least once every twelve (12) months to ensure they are knowledgeable and in compliance with all pertinent laws and regulations. New employees receive training within thirty (30) days of their start date. All documentation related to compliance training including materials, tests, results, attendance and date are maintained. In addition, our compliance training program is updated as necessary to reflect current laws and regulations.

## Compliance

Our compliance team is responsible for developing and enforcing the policies and procedures of our AML/CTF Program.

## Suspicious Activity

We may freeze or suspend your account, as well as report to applicable authorities, if we know, suspect or have reason to suspect suspicious activities have occurred on Swissone Group Ltd. A suspicious transaction is often one that is inconsistent with a customer's known and legitimate business, personal activities or personal means. We leverage our compliance department, which performs transaction monitoring to help identify unusual patterns of customer activity. Our compliance team reviews and investigates suspicious activity to determine if sufficient information has been collected to justify any action from our side.

## Customer Identification

The KYC process is an important part of our AML/CTF Program, and helps us detect suspicious activity in a timely manner and prevent fraud.

Customer security is a key consideration for Swissone Group Ltd and we take our commitment to safeguarding our client best interests extremely seriously.

With this in mind we have implemented a series of KYC (Know Your Client) procedures designed to secure the private and personal information of our clients while at the same time, keeping Swissone Group Ltd in line with compliance best practices and policies for financial services companies. These are aimed at preventing any instances of identity theft, money laundering, fraud or terrorist activity.

We operate on a strict Zero Tolerance basis. Any fraudulent activity will be documented and will result in the immediate closure of any trading accounts related to such activity. Funds deposited in any such accounts will be forfeited.

Proper implementation of KYC procedures is in your best interest as a Swissone Group Ltd client. These procedures secure your personal data and your financial transactions remain secure. Without completing our KYC procedures, your trading activity will be limited and you will not be able to withdraw funds from your account.

Our KYC procedures are extremely thorough, yet at the same time remain straight-forward for our clients to complete.

Opening and funding a trading account with Swissone Group Ltd will require the following documentation to be supplied to us:

A) Proof of Identity (POI) Document. This may be:

Passport  
National Identity Card

B) Secondary Proof of Identity (POI) Document. This may be:

Driving license  
Certificate of Birth / Marriage / Divorce  
Diploma  
Military Identity Card  
International Passport

This proof of identity document must clearly show the following:

Your full name;  
Your date of birth;  
Expiration and Issue date;  
A clear picture (colored photo or scan).

POI documents must have a minimum validity of 6 months before the expiry date.

C) Proof of Residence (POR) Document:

Your Proof of Residence document must be a clearly legible copy of any of the following:

A bank or credit card statement;  
A utility bill for one of the following: water, electricity, phone or gas.

Your Proof of Residence document must clearly show the following details:

Your full name;  
Your address of residence;  
Issue date;  
A clear picture (colored photo or scan).

POR document must be dated within the last 3 months and should contain an official stamp or barcode.

D) Colored photos of both sides of the Credit Card:

If a Credit Card is used to fund your account, we will need copies of the front and back of the credit card with the first 6 and last 4 digits visible. The credit card CVV on the back of the card must also be blacked out. The holder's name and signature must be clearly visible. The expiry date should also remain visible.

Requirements for the quality of documents:

Scans / photos cropped and processed on editing software will not be accepted;  
The photo must be of the document / card itself;  
All necessary data must be visible;  
The edges of the card / document must not be cut off by the boundaries of the image;  
Any text must be readable, even in small print (for example, on the backside of the card);  
Documents with watermarks or patterns must be distinguishable;

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Swissone Group Ltd, registered in Saint Vincent and the Grenadines, registration number 24240 BC 2017, with registered address Beachmont Business Center, Suite 39 Kingstown, St. Vincent and the Grenadines; Swissone Group Ltd, registered in the Republic of the Marshall Islands, registration number 103491, with registered address Trust Company Complex, Ajeltake Road, Ajeltake Island, Majuro, Marshall Islands MH96960

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The texture of the card surface must be visible to distinguish the authenticity of the copies.

It is in your best interest to send us your POI and POR documentation as soon as possible after account registration. Failure to provide suitable documentation may result in limits being placed on your trading.

Furthermore, it is important to understand that without the required documentation being on file with us, withdrawals from your account cannot be processed.