JUST GLOBAL MARKETS (VG) LIMITED

ANTI-MONEY LAUNDERING POLICY

1. ABOUT US

Just Global Markets (VG) Limited, having its address at Trinity Chambers, PO Box 4301, Road Town, Tortola, VG1110, British Virgin Islands, a company regulated by the British Virgin Islands Financial Services Commission ("FSC") under Investment Business License number SIBA/L/24/1177 (hereinafter referred to as the "Company").

In accordance with industry standards and financial market regulations, the Company is committed to adhering to Anti-Money Laundering ("AML") principles and actively prevents any activities aimed at or facilitating the laundering of illicitly obtained funds.

The AML Policy sets out the procedures to prevent criminals from utilizing the Company's services for money laundering, terrorist financing, or other illegal activities.

To achieve this, the Company has implemented a rigorous policy for detecting, preventing, and alerting relevant authorities of any suspicious activities. Additionally, the Company is not permitted to disclose to Clients when law enforcement authorities are informed about their activities. A comprehensive electronic system has been introduced to identify each Client and track the history of all transactions in detail.

To further combat money laundering, the Company does not accept or disburse cash under any circumstances. The Company reserves the right to suspend any Client's transactions that may be deemed illegal or suspicious and potentially related to money laundering, according to the Company's internal assessment.

This AML Policy is communicated to all employees involved in managing, monitoring, or overseeing customer transactions, and to those responsible for implementing the policies, procedures, and controls established within the Company. The Policy also applies to all company officers, appointed contractors, agents, and to all products and services offered by the Company. All business units within the Company will work together to create a unified effort to combat money laundering.

2. DEFINITION OF MONEY LAUNDERING

Money laundering is the process of converting funds obtained through illegal activities (such as fraud, corruption, terrorism, etc.) into legitimate-looking assets or investments to obscure or distort their true source.

Money laundering typically occurs in three stages:

- Placement: In this stage, illicit funds are introduced into the financial system. This can involve converting the funds into financial instruments such as checks, bank accounts, or money transfers. They may also be used to purchase high-value goods that can later be resold. Additionally, the funds might be physically deposited in banks or non-bank institutions, such as currency exchanges. To avoid suspicion, the launderer may opt to make several smaller deposits rather than a large single deposit; this practice is known as "smurfing."
- Layering: This stage involves moving the funds between various accounts or financial instruments to conceal their origin. The goal is to obscure the identity of the person or entity behind the transactions, making it more difficult to trace the illicit funds. Through this process of transferring and altering the form of the funds, the launderer complicates the investigation of the money trail.
- Integration: At this final stage, the funds are reintroduced into the legitimate economy, appearing as though they come from lawful sources. They are used to purchase goods, services, or investments, effectively "cleaning" the money.

3. COMPANY'S PROCEDURES

The Company ensures that it is engaging with a legitimate individual or legal entity. In compliance with applicable laws and regulations set forth by the relevant regulatory authorities, the Company implements all necessary measures to prevent illegal activities. The AML policy is enforced within the Company through the following procedures:

- Know Your Customer (KYC) and Due Diligence: The Company conducts thorough checks to verify the identity of its clients and assess the legitimacy of their activities.
- Client Activity Monitoring: Continuous monitoring of client transactions and behaviors to detect and prevent suspicious activities.
- Record Keeping: Maintaining accurate and detailed records of client interactions, transactions, and compliance-related activities.
- The Company assesses and evaluates the risks associated with each client based on their profile, behavior, initial communication with the Company, and the specific risks related to the services and products offered.

4. KNOW YOUR CUSTOMER (KYC) AND DUE DILIGENCE

In line with the Company's commitment to Anti-Money Laundering (AML) and Know Your Customer (KYC) policies, every Client must undergo a thorough verification procedure. Before engaging in any business relationships, the Company ensures that satisfactory evidence of the client's identity is provided or other appropriate measures are taken to verify the identity of the customer or counterparty.

The Company applies enhanced scrutiny to Clients who are residents of countries identified by credible sources as having inadequate AML standards or who may pose a high risk for crime and corruption. This includes individuals whose funds originate from such countries or who have beneficial ownership linked to high-risk regions.

5. INDIVIDUAL CLIENTS

During the registration process, each Client is required to provide personal information, including: full name, date and place of birth, residential address, phone number, and city code.

To comply with KYC and to verify the provided information, the Individual Client must submit the following documents (if documents are written in non-Latin characters, a notarized translation into English is required to avoid delays in the verification process):

Identity Verification

One of the following documents should be submitted to verify the identity of the Client:

- Valid Passport, or
- National ID Card, or
- Driver's License, or
- Any other government-issued identification document.

The document submitted must include:

- Full name
- Date of birth
- A photograph of the Client

If applicable, confirmation of document validity (issue/expiry date), holder's signature.

These documents must be valid at the time of submission and for at least 30 days after submission.

Proof of Residential Address

The Client's current residential address will be verified using one of the following:

- A recent utility bill (electricity, water, internet, telephone, gas, or any other bill from a reliable source), or
- A recent bank statement, or
- A recent credit card statement, or
- An insurance policy showing the residential address, or
- A police character certificate, or
- A rental/lease/tenancy agreement, or
- A certificate of residence or residence permit (if residing in a country other than the country of birth), or
- A report from the electoral register confirming the individual resides at a specific address, or
- A tax clearance or tax return, showing the individual's name and address, or
- A valid passport, national ID card, or driver's license containing the current address, or
- Any other government-issued document that includes the individual's name and current address.

Utility bills, bank statements, and credit card statements must not be older than six (6) months. Other documents must be current. If required by the Company, a copy of any of the above documents must be apostilled in the country of origin.

Certification of Documents

If certification is required, the documents must be certified by one of the following:

- A Judge
- A Magistrate
- A Notary Public
- A Barrister-at-Law
- A Solicitor
- An Attorney-at-Law
- A Commissioner of Oaths

Both sides of the document are required where applicable (e.g., ID or driver's license). The image of the document must be a high-resolution color photo or scan with no blurs, light reflections, or shadows. All edges of the document should be visible, and all information must be clearly readable, free of watermarks or other obstructions.

Additional Information

Before the settlement of any initial transactions, the Company will make reasonable efforts to obtain the following information (where applicable to the account):

- The Client's occupation
- The Client's investment objectives and financial situation
- Annual income, assets, or net worth
- Any other information necessary to open the account.

6. CORPORATE CLIENTS

When verifying a legal entity, the Company requires the following documents as part of its KYC procedures:

- Copies of the Certificate of Registration or Certificate of Incorporation
- Copies of the Memorandum and Articles of Association, Partnership Agreement, or similar documents, as applicable
- Copies of the By-Laws and the latest General Information Sheet, listing the names of directors/partners and major stockholders, along with any secondary licenses
- Extract from the Commercial Register or an equivalent document that confirms the registration of corporate acts, amendments, and the current status of the legal entity (e.g., Certificate of Good Standing)
- A Certificate of Incumbency issued within the last 3 months
- Information about the Beneficial Owners (BOs) from independent and reliable sources
- KYC documents of all Directors, Shareholders, BOs, and Officers (if applicable)
- Board of Directors' resolutions, signed application forms, and account opening documents, identifying the authorized signatories or principal officers authorized to open an account, make trades, and manage the account
- Proof of the registered address and actual place of business of the corporate entity
- The latest Audited Financial Statements

- In some cases, the Company may also request additional information about the nature of the business, including a description of the business, services/products offered, and the principal place of business.

This procedure helps establish the identity of the Corporate Client and enables the Company to understand their financial activities and provide optimal online trading services.

7. ADDITIONAL PROVISIONS

If, during the course of the business relationship, a Client fails or refuses to provide the required verification information within a reasonable timeframe, the Company reserves the right to terminate the relationship and close the Client's accounts.

Customer Due Diligence (CDD) will be updated or amended whenever there are changes to key details such as:

- Residential or business address
- New identification documents (e.g., new ID card, passport)
- Additional business information, new business ventures, or securities

In the event of such changes, the Company requires appropriate documentation or a letter outlining the update.

8. MONITORING OF CLIENT ACTIVITIES

The Company continuously monitors client activities to identify and prevent any suspicious transactions or activities. A suspicious transaction or activity is one that appears inconsistent with the Client's usual business or transaction history, as known from prior activity or their Client profile.

The Company has implemented both automatic and manual monitoring systems to detect such activities and prevent the use of its services by individuals involved in illicit activities.

The Company reserves the right to suspend any Client's transactions if deemed illegal or potentially related to money laundering, based on internal assessments.

Ongoing monitoring of Client accounts and transactions is a critical component in managing and controlling the risk of money laundering.

9. DEPOSIT AND WITHDRAWAL REQUIREMENTS

The following requirements apply to all Client transactions related to deposits and withdrawals:

- Bank Transfers or Bank Cards: The name used for registration must match the name on the bank account or bank card. Funds can only be withdrawn to the same account or bank card used for deposit.
- Electronic Payment Systems: Withdrawals are only allowed to the same payment system and account used for depositing.
- Alternative Withdrawals: If the account was funded through methods that can't be used for withdrawal, funds may be transferred to the Client's bank account or another agreed-upon method, provided the Company can verify the identity of the account holder.
- Multiple Payment Systems: If an account is credited via multiple payment systems, funds will be withdrawn pro-rata, based on the amount deposited via each system. Any profits can be transferred to any account from which the deposit originated, as long as this is possible.
- Third-Party Transactions: Deposits and withdrawals cannot be made to or from third-party accounts, including bank accounts, bank cards, or electronic wallets.

10. RECORD KEEPING

The Company will maintain records for all documents used to verify client identities and all transaction data, in accordance with applicable AML regulations. These records will be kept for the following periods:

- Client Identification and Transaction Records: All documents relating to customer identification and transactions will be stored securely for five (5) years from the date of the transaction.
- Closed Accounts: For accounts that have been closed, identification records, account files, and business correspondence will be retained for at least five (5) years from the date the account was closed.