PRIME XBT

ANTI MONEY LAYNDERING POLICY

Version. 2

Introduction

Any reference to “PrimeXBT”, the “Company”, “we”, “us”, “our” herein, shall be a reference to Prime XBT Trading Services Ltd, incorporated and existing under the laws of Saint Lucia, with Registration No. 2024-00343, having its registered office address at Top Floor, Rodney Court Building, Rodney Bay, Gros Islet, Saint Lucia.

This AML & KYC Statement shall outline the way in which PrimeXBT shall comply with its Anti Money Laundering (“AML”) and Countering Terrorism Financing (“CTF”) responsibilities under applicable international law.

1. AML & KYC Statement

PrimeXBT operates in a number of different jurisdictions, which often have differing Anti-Money Laundering (AML) and Counter Terrorist Financing (CTF) requirements. This public statement details our approach to AML & CTF and the common practices we apply as part of our commitment to detect and prevent different types of financial crimes related to our products and services.

Therefore, our policies, procedures, and controls for the prevention of money laundering and terrorism financing are compiled in accordance with international AML/CTF laws and regulations, as well as the industry’s common practices, standards, and controls.

The AML/CTF policies and procedures apply to all officers, employees, and affiliated entities of PrimeXBT.

2. Risk Management Approach

In order to enhance our Risk Management approach, PrimeXBT has implemented a Compliance function, responsible for the elaboration of a programme and policies on the prevention of money laundering and terrorism financing.

This approach involves a number of steps to assess the most proportionate way to manage and mitigate the Money Laundering (“ML”) and Terrorism Financing (“TF”) risks faced by the PrimeXBT. These policies, include provisions with regard to the following:

✓ Customer Due Diligence (“CDD”), on certain categories of clients and/or when deemed necessary by the Compliance Department.

✓ Enhanced Due Diligence, depending on each Client’s risk profile.

✓ Transaction Monitoring, including the restriction of suspicious transactions.

✓ Suspicious Transaction Reporting, depending on the applicable/relevant jurisdiction(s).

✓ Oversight of third-party Affiliates, Business Introducers, and other Outsourced functions;

✓ Targeted AML/CTF training to our officers and employees;

✓ Sanctions Compliance Programme, including screenings; and

✓ Internal policies forbidding the provision of services to certain jurisdictions and/or specific types of clients.

PrimeXBT adopts a risk-based approach in designing its internal policies and procedures for assessing and effectively managing the risk of its services being used for ML and FT purposes.

3. Due-Diligence / Monitoring Procedures

PrimeXBT shall duly apply client identification procedures and other client due diligence measures in the following cases:

✓ When a withdrawal request exceeds the internal threshold;

✓ When there are indications of potential market abuse and/or possible attempt of market manipulation;

✓ When there is a suspicion of money laundering or terrorist financing, regardless of the amount of the transaction; and/or

✓ When there are doubts about the veracity or adequacy of client identification data.

The identification procedures and customer due diligence measures, include but are not limited to, identifying the client and verifying the client's identity on the basis of documents, depending on the case - obtaining information on the purpose and intended nature of the business relationship, obtaining information of the residential address and source of funds verification.

PrimeXBT shall also examine, as far as reasonably possible, the background and purpose of all complex and unusually large transactions, and all unusual patterns of transactions, which have no apparent economic or lawful purpose and in particular, shall increase the degree and nature of monitoring of the business relationship, in order to determine whether those transactions or activities appear suspicious.

4. Timing & Verification

The timing and verification of the identification documents of clients is completed during the course of the business relationship when necessary, so as not to interrupt the normal conduct of business and where there is little risk of money laundering or terrorist financing occurring.

When the identification and verification procedures are initiated by PrimeXBT, clients are notified immediately via email. Thereafter, the cumulative time in which the verification and due-diligence shall be completed by the clients, should not exceed 20 days from the initial notification date.

5. Applicable KYC Documents

Applicable KYC documentation for natural persons, is the following:

✓ **Identification** - Valid, not expired: Passport, ID or Driving License;

✓ **Proof of Address** – Recent, dated within 6 months: Utility Bill, Land- line Bill, Rental Agreement, Bank Statement, Tax Bill or any other equivalent document;

✓ **Source of Funds** – Bank or Trading Account Statement, Tax Declaration, Payslip or any other document supporting the source of income;

Applicable KYC documentation for legal entities, is the following:

✓ **Statutory Documents** – Corporate Certificates of legal existence, directors and beneficial owners;

✓ **Identification** - Valid, not expired: Passport, ID or Driving License of authorized individual acting on behalf of the legal entity;

✓ **Source of Funds** – Financial Statements, Bank or Trading Account Statement, Tax Return or any other document supporting the source of funds of the legal entity;

6. Record Keeping

For the purpose of performing our AML & CTF controls, PrimeXBT preserves documents and information as required by prevailing legislation and local requirements in various jurisdictions.

This comprises, for example, customer due diligence, ongoing monitoring, and governance records as detailed above, including the reasons for decisions and actions taken from an AML and CTF perspective. Employee training records and internal periodic/annual reports are also retained in addition to records pertaining to internal and external suspicious activity reports.

The duration of retention of such data is for a minimum of five (5) years, calculated from the date on which business relationships are terminated.

7. Training

All employees of PrimeXBT, regardless of their seniority, are required to undertake AML-related training. The content of this training is refreshed on an annual basis, and includes background information on money laundering, potential offences, the role of colleagues in detecting potential risk triggers and escalating their detection, alongside case studies.

8. Amendments

PrimeXBT reserves the right to amend this AML/KYC Statement from time to time. In case there is a material change to this statement, we will inform clients by publishing an updated version of this Statement on our website. The prevailing version of the AML/KYC Statement is available on the Company's Website. This Statement updates and replaces our prior AML/KYC Statements, as the latest available and applicable version. For any further information and/or clarifications, please contact the Compliance Department via email at support@help.primexbt.com