

## **EXORAYS ANTI-MONEY LAUNDERING (AML) POLICY**

At Exorays, we are committed to preventing money laundering, terrorist financing, and other illicit activities. This Anti-Money Laundering (AML) Policy outlines our procedures, controls, and measures to ensure compliance with applicable anti-money laundering laws and regulations. By using our online cryptocurrency and CFD trading platform (referred to as the "Website"), you acknowledge and accept the practices described in this AML Policy.

### **PURPOSE**

The purpose of this AML Policy is to establish a framework for identifying, preventing, and mitigating the risks of money laundering, terrorist financing, and other financial crimes. We are dedicated to maintaining the integrity of our platform, protecting our customers, and contributing to the global effort against illicit activities.

### **COMPLIANCE PROGRAM**

2.1. AML Compliance Officer: We have designated an AML Compliance Officer responsible for overseeing our AML efforts, ensuring compliance with applicable laws, regulations, and industry best practices, and implementing internal controls and procedures.

2.2. Risk-Based Approach: We adopt a risk-based approach to assess and manage AML risks associated with our customers, transactions, products, and services. Our risk assessment considers factors such as customer profiles, transaction volume, jurisdictional risks, and product vulnerabilities.

2.3. Policies and Procedures: We have implemented policies and procedures to address AML risks, including customer identification and verification, ongoing monitoring, reporting of suspicious activities, record-keeping, employee training, and risk assessment.

2.4. Employee Training: We provide regular training to our employees to ensure their awareness and understanding of AML laws, regulations, and internal policies. Training covers topics such as customer due diligence, suspicious transaction monitoring, reporting obligations, and recognizing red flags.

### **CUSTOMER DUE DILIGENCE (CDD)**

3.1. Customer Identification: We conduct customer identification procedures to verify the identity of our customers based on reliable and independent documentation. This includes collecting and verifying personal information, such as full name, date of birth, nationality, and government-issued identification documents (e.g., passport, driver's license).

3.2. Enhanced Due Diligence (EDD): In certain cases, we may apply enhanced due diligence measures to customers presenting higher risk, such as politically exposed persons (PEPs), high-net-worth individuals, or customers from high-risk jurisdictions. EDD measures may include additional identity verification steps, source of funds verification, or obtaining additional documentation.

3.3. Ongoing Monitoring: We continuously monitor customer transactions and activities to detect any suspicious or unusual behavior. This includes monitoring transaction patterns, volume, frequency, and other relevant factors. We may request updated information or documentation from customers to ensure the accuracy and validity of their records.

#### REPORTING OF SUSPICIOUS ACTIVITIES

4.1. Suspicious Activity Reporting: We have established procedures to identify, document, and report suspicious activities to the appropriate authorities. Our employees are trained to recognize red flags and indicators of potential money laundering, terrorist financing, or other illicit activities.

4.2. Internal Reporting Channels: We provide channels for employees and stakeholders to report any suspicions or concerns related to potential money laundering or financial crimes. Reports are handled confidentially and in compliance with applicable laws and regulations.

#### RECORD KEEPING

5.1. Record Retention: We maintain records of customer identification, transaction details, and other relevant information obtained during the customer due diligence process. These records are securely stored and retained in accordance with applicable laws and regulations.

5.2. Confidentiality and Access Controls: Customer records are strictly confidential and only accessible to authorized personnel who require access for legitimate purposes, such as compliance, legal, or regulatory requirements.

#### AML TRAINING

6.1. Ongoing Training: We provide regular training to our employees to ensure their understanding of AML risks, regulatory obligations, and internal policies. Training includes updates on emerging trends, typologies, and techniques used in money laundering and terrorist financing.

6.2. Awareness and Vigilance: We encourage all employees to maintain a high level of awareness and vigilance in detecting and preventing money laundering and financial crimes. Employees are encouraged to report any suspicions or concerns promptly.

#### COMPLIANCE AND REPORTING

7.1. Regulatory Compliance: We are committed to complying with all applicable AML laws, regulations, and reporting obligations. We stay abreast of changes in AML regulations and adjust our internal controls and procedures accordingly.

7.2. Reporting Obligations: We cooperate with law enforcement agencies, regulatory authorities, and other relevant parties by reporting any suspicious activities, as required by law. We provide timely and accurate information to assist in investigations and prosecutions.

#### CONTACT US

If you have any questions, concerns, or requests regarding this AML Policy or our AML practices, please contact our AML Compliance Officer at [support@exorays.com](mailto:support@exorays.com). We take AML matters seriously and will respond to your inquiries as soon as possible.