FIXONE
GLOBAL TRADING

AML/KYC POLICY

Anti Money Laundering/
Know Your Customer Policy

FIXONE GLOBAL TRADING SP. Z.O.O.

Registered at: U.HOZA, 86, 0fTce/suite 210, 0f WARSAW, POLAND
Register №/NIP: 0001004695 /701 111 7525
Register of Virtual Currency Businesses.
no. 2401-CKRDST.4060.1242.2022
Reference no. RDWW – 550

Fixone is the trading name representing the Fixone Group of companies. Fixone Group comprises several entities, each with distinct registrations and locations: FIXONE GLOBAL TRADING SP. Z.O.O, which oversees and operates the website https://fixoneglobal.com/ ("the Company") is officially registered in Poland and holds authorization and oversight from the Polish Financial Supervision Authority (UKNF), governed by Certificate no. 2401-CKRDST.4060.1242.2022. The registered office is located at U. HOZA, 86, office/suite 210, in WARSAW, POLAND. The company also has an established registered office in Ukraine at 03150 Kyiv, St. Svyatoshynsca, 34-L, office no. 2, along with a contact office in Dubai at Conrad Office Tower no. 1008, Sheikh Zayed Road, Dubai, UAE; Profixone Capital LLC is a legal entity registered in St. Vincent and the Grenadines, and it operates with authorization and supervision from the Financial Services Authority of St. Vincent and the Grenadines, operating under professional license no. 834LLC. The registered office for this entity is situated at Suite 305, Griffith Corporate Centre, P.O.Box 1510, Beachmont, Kingstown, St. Vincent and the Grenadines; Dexnet Information Technology co is registered in Dubai and operates under professional license no. 1207881, also issued by the government of Dubai. Its registered location is at 1008 Conrad Business Tower, Sheikh Zayed Road, Dubai, UAE; Profixone FZE maintains its registered office within the Dubai World Trade Center in Dubai, UAE, and operates under professional license no. L-1492, issued by the government of Dubai.

The Fixone Group has developed and formally approved this AML/CFT Policy to comply with the best AML/CFT practices.

1. GENERAL TERMS

1.1 Introduction

This Policy is provided to help the Client understand, as a potential or actual client of the Company, the basic principles that the Company employs to discharge its regulatory duties relating to Client identification and verification and the measures that the Company takes on prevention of money laundering and terrorist financing within its platform.

The Company is committed to preventing and detecting money laundering and terrorist financing activities in accordance with the laws and regulations of Poland. This AML/KYC Policy outlines the procedures, processes, and controls that the Company will implement to ensure compliance with Polish anti-money laundering and counter-terrorist financing laws and regulations.

This Policy forms an integral part of the Agreement concluded between the Client and the Company and other terms and policies that govern Client's relationship with the Company, which the Client must read, understand, agree and accept.

This policy applies to all employees, customers, partners, and affiliates of FIXONE GLOBAL TRADING and covers all aspects of AML and KYC compliance related to cryptocurrency exchange activities.

1.2. Legal and Regulatory Framework

The Company is subject to and complies with all relevant AML and KYC regulations in Poland, including but not limited to: The Act on Counteracting Money Laundering and Terrorism Financing of March 1, 2018 (Ustawa o Przeciwdziałaniu Praniu Pieniędzy i Finansowaniu Terroryzmu).

The Company maintains communication with and reports to the relevant Polish regulatory authorities, including the Polish Financial Supervision Authority (Komisja Nadzoru Finansowego), as required by law.

1.3 Scope

1.3.1 This Policy lays down the Company's framework and procedures for:

a. Preventing the Company from being abused, intentionally or unintentionally, by criminal elements for money laundering or financing of terrorist activities;

b. Enabling the Company to know/understand the Client and Clients' background and source of funds;

c. Properly identify and verify the identity of the Client;

d. Properly discharge its AML/CFT obligations towards the Regulator.

1.3.2 The KYC Policy includes the following four key elements:

a) Customer Acceptance Policy (CAP);

b) Customer Identification Procedures (CIP);

c) Monitoring of Transactions;

d) Risk Management.

2. OBLIGATIONS AND PROCEDURES

2.1 In accordance with the Laws, the Company is obliged to set out policies and procedures for preventing money laundering activities. Those procedures, which are implemented by the Company include, among others:

a) Client identification and due diligence procedures and application of a risk-based approach;

b) Application of an enhanced customer due diligence procedure where required;

c) Record keeping procedures in relation to the Clients' identity and transactions;

d) Internal reporting procedures to the appointed Company's Money Laundering Reporting Officer; or in his / her absence, the Deputy MLRO, of the suspicious activity or transactions possessing the suspicion on the commitment of money laundering or terrorist financing offences;

e) Procedures of internal control, risk management, with the purpose of preventing money laundering and terrorist financing activities;

f) Monitoring and examination of transactions and activities where there is suspicion or reasonable grounds to believe the commission of a money laundering or terrorist financing offence has occurred or reasonable grounds to suspect there is an attempt to commit a money laundering or terrorist financing offence.

2.2 The Company applies appropriate measures and procedures of a risk-based approach to focus on the areas where the risk of money laundering and terrorist financing appears to be higher.

A risk-based approach is adopted by the Company during the verification of the Clients' identity, the collection of information for the construction of Clients' economic profile and monitoring of Clients' transactions and activities. Taking into consideration the assessed risk, the Company determines the type and extent of measures it adopts, to manage and mitigate the identified risks.

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The Company, in accordance with the Laws as applicable, conducts the verification of the identity of the Clients and the Directors, Shareholders and Beneficial Owners (if the Client is a corporate entity) during the establishment of the business relationship. The verification of Clients' information is conducted via the submitted documents electronically.

2.3 Client Identification

The Company performs Client identification prior to the establishment of the business relationship and proceeds with verification of the potential Clients' identity prior to or during the establishment of a business relationship to prevent interruption of the normal conduct of business and where there is limited risk of money laundering or terrorist financing occurring. In case of the latter, the due diligence procedure shall be completed as soon as posible after the initial contact.

Decisions to enter into or pursue business relationships with higher- risk Clients require application of enhanced due diligence measures.

Each Client is required to complete the Company's KYC procedures by submitting the relevant KYC documentation, including proof of Source of Funds where necessary.

The Company will implement robust customer identification procedures to verify the identity of its customers, including but not limited to:

- Collecting government-issued identification documents.
- Verifying the authenticity of documents through approved means.
- Conducting enhanced due diligence for higher-risk customers.

The Company will continuously monitor customer transactions and behavior to identify suspicious activities. This includes the use of transaction monitoring tools and automated alerts.

The Company will conduct enhanced due diligence on customers who are identified as politically exposed persons (PEPs) in accordance with applicable regulations.

2.4 Know Your Customer

The Know Your Customer Policy, commonly referred to as KYC, is a mandatory framework for all financial institutions used for Client identification process. It aims, among others, at protecting Clients from impersonation and fraud and at mitigating reputational, operational, and legal risks. It means that the identity and permanent address of individuals or corporate entities resorting to financial services of the Company are ascertained at all times. It also involves making reasonable efforts to determine the Clients' tax residency, employment and financial information, Clients' source of funds, ascertaining the nature of the Clients' business activity, among others.

It is prohibited under the applicable Laws to open anonymous and fictitious accounts. Financial institutions shall ascertain the true identity of their Clients at all times.

The information collected is kept confidential by the Company and will not be disclosed to any third party except as required by applicable Laws.

As per the KYC requirements, the Company holds up-to-date and confirmed information about the identity, address, occupation status and business activity of the current and prospective Clients.

The KYC verification exercise relies on requesting the Client to provide identification documents, data or information as and when deemed necessary and involves the determination of a Client's profile, whether individual or corporate, at the beginning of a business relationship and on a continuous basis.

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The Company employs enhanced due diligence measures with respect to the Company's risk appetite and client's transactions, such as the request of additional documents and information.

Lack of required information or mandatory KYC documents will irrevocably result in the rejection of any application for services. This may also lead to account closure and a stop to all transactions until the availability of all the information and documentation required for the KYC process.

2.5 Client Verification

The Client is obliged to provide the following documents to confirm identity and address:

2.5.1 For Individual Clients:

- Proof of identity: - National identity card / Current valid passport

- Proof of address: - Recent utility bill (Telephone / Electricity /Water bills) / Recent bank or credit card statement / Reference or Letter from regulated financial institution or government authority specifying address. The Proof of address should not bear a PO Box number and be not older than 3 months, as emphasized by the Regulator; - Any other document or documents which, beyond reasonable doubt, establish(es) the address of the Client.

The above are basic KYC documents and additional documents may be required in certain cases.

2.5.2 For Corporate entities:

The required KYC documents are those which will allow establishing and verifying the legal existence of the entity, the business conducted by the entity, the identity, address, and rights of those in control of the company (directors, significant shareholders, ultimate beneficial owners, authorized signatories, etc.):

a) Corporate entity: - Certificate of Incorporation; - Trade License (if any);

- Memorandum and Articles of Association; - Certificate of Incumbency (if necessary); - Certificate of Good Standing (if necessary); - Updated Registers of Directors/Shareholders/Ulti mate Beneficial Owners; - Proof of Beneficial Ownership; - Bank Account Statement (last 6 (six) months) - Due Diligence documents on the Directors/Shareholders/Ulti mate Beneficial Owners.

b) Account Representative: - Board Resolution authorizing the individual to act on its behalf; or - Power of Attorney authorizing the individual to act on behalf of the Company; - Proof of Identity; - Proof of Address.

c) Full KYC documents for the Directors, Shareholders and Beneficial Owners of the corporate entity.

2.5.3 The Company reserves the right to require, when it deems appropriate, notarized and/or apostilled copies of any of the above documents along with English translation thereof.

The Company reserves the right to take such additional measures as it deems fit when conducting Client due diligence in cases where, in the Company’s opinion, there is elevated higher risk of money laundering.

2.5.4 All documents must be submitted to support@profixone.com within five calendar days from the date the KYC procedure is requested. Our team will review the received documents within two to five business days.

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2.5.5 When entering into the Client Agreement with the Company, the Client authorizes the Company to carry out such searches and to transfer the Client's information to such external data bases and verification service providers (such as World Check One) as the Company might deem necessary to complete its KYC and verification procedures.

The Company maintains complete and ultimate authority regarding the specific type and format of the KYC documents gathered from the Client. The Client will receive guidance on the necessity for additional information or documents from the respective client onboarding officer at the Company.

2.6 Politically Exposed Persons

2.6.1 The Client undertakes to declare their PEP (politically exposed person) status and provide copies of documents confirming such status and indicating the origin of funds used to make a deposit.

A politically exposed person means a natural person who is or who has been entrusted with prominent public functions and includes the following:

a) Heads of State, heads of government, ministers, and deputy or assistant ministers; -Members of parliament or similar legislative bodies; - Members of the governing bodies of political parties; - Members of supreme courts, of constitutional courts or of other high-level judicial bodies, the decisions of which are not subject to further appeal, except in exceptional circumstances; - Members of courts of auditors or the boards of central banks; - Ambassadors, chargés d'affaires and high-ranking officers in the armed forces; - Members of the administrative, management or supervisory bodies of State-owned enterprises; - Directors, deputy directors and members of the board or equivalent functions; - Mayors.

b) Family members include the following:

- The spouse, or a person considered to be equivalent to a spouse, of a politically exposed person; - The children and their spouses, or persons considered to be equivalent to a spouse, of a politically exposed person; - A politically exposed person's parent.

c) Persons known to be close associates means:

- Natural persons who are known to have joint beneficial ownership of corporate entities or legal arrangements, or any other close business relations, with a politically exposed person;

- Natural persons who have sole beneficial ownership of a corporate entity or legal arrangement which is known to have been set up for the de facto benefit of a politically exposed person.

2.6.2 The Company is legally obliged to refuse service and return money if a politically exposed person (PEP) fails to provide documents explaining the origin of deposit funds. The Company undertakes to repeat identification of PEP statuses that have been confirmed to update the data on a semi-annual basis.

2.7 Record Keeping

The Company meticulously records the verification process, encompassing all KYC information furnished by the Client, the outcomes of the verification, and the resolution of any discrepancies detected during this process.

Furthermore, the Company retains the KYC documents and information of its Clients, in addition to details regarding their transactions, for a period specified by Polish AML regulations following the termination of the business relationship with the respective Client. However, circumstances may necessitate the retention of records for extended periods beyond the minimum prescribed timeframe.

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2.8 Suspicious Activity Reporting

The Company is obligated to report any suspicious activities or transactions to the relevant Polish authorities in accordance with applicable laws and regulations.

Employees and contractors of the Company are encouraged to report any suspicious activities to the designated AML Compliance Officer.

2.9 AML Compliance Officer

The Company will designate an AML Compliance Officer responsible for implementing and monitoring this AML/KYC policy and ensuring compliance with relevant Polish regulations.

The Company will provide ongoing AML and KYC training to employees to ensure they understand their obligations and responsibilities in compliance with Polish AML regulations.

Non-compliance with this AML/KYC policy may result in disciplinary action, legal action, or termination of customer accounts in accordance with Polish law.

2.10 When a Customer's exchange volume experiences a notable increase or when their transactions raise suspicion or deviate from their typical profile, the Company's AML/CTF verification responsibilities will be heightened accordingly. In such instances, the Company may request additional information and documentation to elucidate the nature of the transactions, the source of funds, residential address, income details, and other pertinent information. In accordance with the procedures outlined in the Company's internal protocols and governing laws, the Company reserves the right to implement an account blockade as deemed necessary.

The Company is committed to promptly reporting any suspicious transactions to the relevant authorities as mandated by the law. If the Company's assessment of the information provided by the Customer does not adequately address concerns or mitigate risks, the Company may be compelled to suspend its services.

The meticulous maintenance of records is of paramount importance for effective monitoring, and the Company is obligated to retain all records in accordance with the timeframes stipulated in its internal regulations and as mandated by the law.

3.11 The Company is strictly prohibited from engaging in transactions with individuals, entities, or nations that appear on sanctioned lists. To ensure compliance, the Company conducts thorough screenings against sanctions lists established by authoritative bodies such as the United Nations, OFAC (Office of Foreign Assets Control), and the European Union, among others.

3. POLICY REVIEW

This AML/KYC policy will be reviewed and updated regularly to ensure it remains effective and compliant with changing Polish regulations and industry standards.

This AML/CFT Policy is supported by adequate and effective internal policies, procedures and controls to manage and mitigate money laundering and terrorist financing risks in Company’s business operations.

The purpose of this policy is to introduce the obligatory measures and other obligations stipulated by the Act On Counteracting Money Laundering and Financing of Terrorism of March 1, 2018, as well as other legislation.

When Customer first uses Company's services, this policy is treated as having been accepted by such Customer.

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4. DEFINITIONS

“AML/CFT” – means anti-money laundering - a set of activities, procedures, and regulations designed to prevent criminal activities related to money laundering (AML), and counteracting the financing of terrorism (CFT) - a set of activities, procedures and regulations created in order to prevent criminal activities related to terrorism.

Beneficial Owner - means the natural person (i) who ultimately owns or controls a customer (client); (ii) on whose behalf a transaction is being conducted; and (b) includes those natural persons who exercise ultimate control over a corporate entity or legal arrangement and such other persons as may be prescribed.

Business relationship – a relationship between the Company and the Client that originates when the Company performs an economic or professional activity and that is expected to have an element of duration at the time when the contact is established.

Corporate Entity - all bodies corporate including partnerships, companies, trusts, foundations, associations and any incorporated or unincorporated clubs, societies, charities, churches and other non-profit making bodies, institutes, friendly societies or cooperative societies.

Client – natural person or an association of such persons, to whom the Company provides financial services (including potential clients).

Client Risk Profile– the overall risk associated with the client in relation to ML/TPF, which is comprised of the combination of the higher risk factors associated with the client.

Client risk scoring system – the Company’s established system, which numerically represents the total AML/CTPF risk level inherent in co- operation with a specific client.

Compliance laws, rules and standards – Applicable Laws regulating activity of the Relevant Person \ related to the standards of professional conduct and codes of ethics, other activities related to the Regulated Person’s best practice and operating standards.

Compliance Officer (“CO”) – a senior officer with relevant qualifications and experience appointed to oversee the AML/CTPF compliance function and internal control responsibilities.

Enhanced Due Diligence – a process of detailed verification and increased monitoring or vigilance pertaining to customers who are considered to represent a higher-than-normal risk for money laundering and/or terrorist financing, or other financial crimes.

High- risk client – Customers or Applicants for Business who pose a higher risk of money laundering, terrorist financing or other financial crimes;

High Risk Countries – are subject to sanctions, embargos or similar restrictive measures imposed by the United Nations, European Union or other regional or international organization.

Know Your Customer (KYC) – Know Your Customer (KYC) – A fundamental regulatory framework that mandates gathering information and conducting verifications to establish a service provider's understanding of their client or customer with whom a business relationship has been established.

Legal Person – all bodies corporate including partnerships, companies, trusts, foundations, associations and any incorporated or unincorporated clubs, societies, charities, churches and other non-profit making bodies, institutes and any similar bodies.

MLRO/Reporting Officer – the Money Laundering Reporting Officer appointed to oversee the prevention of anti-money laundering and terrorist financing abuse.

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Person – an individual, natural person or Legal Person.

Politically Exposed Person (PEP) – Natural persons who are or have been entrusted with prominent public functions, including: (a) heads of State, heads of government, ministers and deputy or assistant ministers; (b) members of parliament; (c) members of supreme courts, of constitutional courts or of other high-level judicial bodies (d) members of courts of auditors or of the boards of central banks; (e) ambassadors, chargés d'affaires and high-ranking officers in the armed forces; (f) members of the administrative, management or supervisory bodies of State-owned enterprises, (g) "important political party officials". as well as their immediate family members or person known to be close associates of such persons.

Politically Exposed Person's family members – the term "immediate family members" refers to all-natural persons, including in particular: a) the spouse, (b) any partner considered by national law as equivalent to the spouse, (c) children and their spouses or partners, (d) parents.

Verification Subject – a person whose identity is required to be established by verification. Ultimate Beneficial Owner (UBO) - shall mean any natural person who ultimately owns or controls the client and/or any natural person on whose behalf a transaction or activity is being conducted. The beneficial owner shall at least include: (a) in the case of corporate entities: (i) any natural person who ultimately owns or controls a legal entity through direct or indirect ownership or control over a sufficient percentage of the shares or voting rights in that legal entity, including through bearer share holdings, other than a company listed on a regulated market that is subject to disclosure requirements consistent with Community legislation or subject to equivalent international standards; a percentage of more than 25% shall be deemed sufficient to meet this criterion; (ii) any natural person who otherwise exercises control over the management of a legal entity: (b) in the case of legal entities, such as foundations and legal arrangements, such as trusts, which administer and distribute funds: (i) where the future beneficiaries have already been determined, any natural person who is the beneficiary of 25% or more of the property of a legal arrangement or entity; (ii) where the individuals that benefit from the legal arrangement or entity have yet to be determined, the class of persons in whose main interest the legal arrangement or entity is set up or operates; (iii) any natural person who exercises control over 25% or more of the property of a legal arrangement or entity."

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