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Anti – Money Laundering Policy

Tradestone Ltd

89, Vasileos Georgiou A' street, Office 101,
Potamos Germasogeias 4048, Limassol, Cyprus

2025

Version Control

Document Owner: **Tradestone Ltd**

Version No.	Approval Date:	Revisions/Changes:
3.0	May 2021	Update of Policy
4.0	September 2022	Update of Policy
5.0	November 2023	Update of Policy
6.0	December 2024	Update of Policy
7.0	November 2025	Update of Policy

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CySEC License 331/17

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1. Introduction

Tradestone Ltd is a Cyprus Investment Firm (hereinafter the “CIF” or “Company”) regulated by the Cyprus Securities and Exchange Commission (hereinafter the “CySEC”) operating under license number 331/17.

The Company is committed to applying high standards of the Anti-Money Laundering Compliance and Anti-Terrorist Financing by strictly following the requirements of the European Union Directives, the Law and relative Directives of the CySEC.

2. Money Laundering

Money laundering is the process of attempting to conceal the true origin and ownership of the proceeds of criminal activities in an effort to legitimate such funds.

It is accomplished in three stages:

- ✚ Placement – the physical disposal of cash proceeds derived from criminal activity through among others, converting them into financial instruments or bank deposits in a manner that will not raise suspicions.
- ✚ Layering – separating the illicit proceeds from their source by creating complex layers of financial transactions designed to disguise the audit trail and provide anonymity; and
- ✚ Integration – the provision of apparent legitimacy to wealth derived from crime. If the layering process succeeds, integration schemes place the laundered proceeds back into the economy in such a way that they re-enter the financial system appearing as normal business funds.

3. Terrorist Financing

Terrorist Financing is the provision of funds or market mediums or in any way receiving collecting, disposing, or managing funds with the intention to facilitate or assist the execution of terroristic actions either by a terrorist organization or by any individual terrorist via the financial system.

4. Policies and Procedures

In accordance with the Law, the Company has set out policies and procedures for preventing money-laundering and terrorist financing activities that aim to adhere to the principles of knowing your customer, monitoring the client’s activity and keeping appropriate records.

The most important procedures the company implements in order to achieve these are the following:

- ✚ Identification and due diligence procedures of new and existing clients which comprise of:
 - i. verifying the client’s identity based on documents, data or information obtained from a reliable and independent source



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- ii. Identifying the ultimate beneficial owner including as regards to legal persons, trusts, companies, foundations, and similar legal arrangements taking reasonable measures to understand the ownership and control structure of the client
 - iii. Assessing and as appropriate obtaining information on the purpose and intended nature of the business relationship
- ✚ Record keeping procedures in relation to clients' identity and their transactions such as:
 - i. Conducting ongoing monitoring of the business relationship including scrutiny of transactions undertaken throughout the course of that relationship to ensure that the transactions being conducted are consistent with the Company's knowledge of the client, the business and risk profile, including where necessary the source of funds and ensuring that the documents, data, or information held are kept up to date
 - ii. Ensuring that all customer due diligence information and transaction records are retained for a minimum period of five (5) years following the termination of the business relationship, or up to seven (7) years upon request by the competent authorities for the purposes of investigation. As a Cyprus Investment Firm (CIF), the Company strictly complies with applicable Anti-Money Laundering (AML) laws and regulations, which take precedence over any conflicting provisions of data protection laws, including the General Data Protection Regulation (GDPR).
 - ✚ Internal reporting procedures to a competent person (the AMLCO) appointed to receive and consider information that give rise to knowledge or suspicion that a client is engaged in money laundering or terrorist financing activities.
 - ✚ Appropriate procedures of internal control, risk management, with the purpose of preventing money-laundering and terrorist financing activities.
 - ✚ Detailed examination of every transaction that due to its nature is considered vulnerable to money laundering and terrorist financing, and especially of complicated or unusually large transactions and transactions that take place without an obvious financial or legal purpose.
 - ✚ Measures for making employees aware of the above procedures to prevent money laundering and terrorist financing and of the relevant legislations; and
 - ✚ Provision of regular training to employees to help them in the recognition and handling of transactions suspected to be associated with money laundering and terrorist financing.

5. Company Rights and Reporting

The Company reserves the right to collect and validate proof of identification from its clients prior to account opening and any payments of proceeds.

Clients should assume that all information provided to the Company is available to the competent regulatory authorities in:

- ✚ The country of incorporation of the Company, i.e. the Republic of Cyprus;
- ✚ The country of origin of any funds transmitted to the Company; and
- ✚ The destination country of any funds refunded by or withdrawn from the Company.

The Company reserves the right to refuse to process a transfer of funds at any stage if it believes it to be connected in any way to criminal activities or money laundering.



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Third party or anonymous payments shall not be accepted. If the Company is not satisfied that you are the sender of the money it reserves the right to reject the money and return it to the remitter less any transfer fees or other charges, the Company further reserves the right to terminate your account held with Us with immediate effect.

The Company is obliged to report all suspicious transactions and is prohibited from informing the client that they have been reported for suspicious account activity. Account misuse may result in criminal prosecution.

The Company does not want your business if your funds are sourced from criminal activities or if the nature of your account transactions is illegal in any manner whatsoever.

6. Additional Documentation and Termination

You may be required to submit additional documentation as required at any point of the business relationship under our Anti-Money Laundering obligations or any similar applicable regulations to Us should an investigation arise.

The Company may terminate its business relationship with the client either with, or without notice, for a series of severe reasons, deriving from Regulatory Obligations, including taking measures against Money Laundering and extending (but, not limited to) breach of the client agreement and terms and conditions, bad faith, attempt to commit fraud, etc.

The Company reserves the right to review and/or amend its Anti-Money Laundering Policy at its sole discretion, whenever it deems fit or appropriate.



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