

## MONEY LAUNDERING PREVENTION POLICY

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| <b>Original Issue Date:</b>       | June 2022                                 |
| <b>Approver(s):</b>               | Board of Directors                        |
|                                   | TTCM TRADERS TRUST CAPITAL<br>MARKETS LTD |
| <b>Owner(s):</b>                  | LIMITED                                   |
| <b>Contact Person:</b>            | Chief Executive Officer                   |
| <b>Classification:</b>            | Money Laundering Prevention Policy        |
| <b>Operational Applicability:</b> | All personnel & Clients                   |
| <b>Last Revision Date:</b>        | June 2022                                 |
| <b>Last Reviewed Date:</b>        | October 2022                              |
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| <b>Version:</b>                   | 3   |
| <b>Other Languages:</b>           | N/A                                       |

**TTCM Traders Trust Capital Markets Limited ("TTCM CY")**, is a Cyprus Investment Firm incorporated under the laws of Cyprus, which has its principal place of business at 3 Thalia Street, Office Number 310-318, 3rd Floor, 3011, Limassol, Cyprus, and registered with the Registrar of Companies in Nicosia under number HE 250591. TTCM CY is regulated as a Cyprus Investment Firm ('CIF') by the Cyprus Securities and Exchange Commission ('CySEC') under license number 107/09 and operates in accordance with the Markets in Financial Instruments Directive ('MiFID II') of the European Union.

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## 1.INTRODUCTION

1.1. ‘TTCM Traders Trust Capital Markets Limited’, is a Cyprus Investment Firm incorporated under the laws of Cyprus, which has its principal place of business at 3 Thalia Street, Office Number 310-318, 3rd Floor, 3011, Limassol, Cyprus, and registered with the Registrar of Companies in Nicosia under number: HE 250591 (the “Company”). The Company is regulated as a Cyprus Investment Firm (‘CIF’) by the Cyprus Securities and Exchange Commission (‘CySEC’) under license number 107/09.

1.2. The Company is operating under Directive 2014/65/EU of the European Parliament and of the Council of 15 May 2014 on Markets in financial instruments and amending Directive 2002/92/EC and Directive 2011/61/EU (the “Markets in Financial Instruments Directive 2014/65/EU”) or “MiFID II”) and amending Directive 2002/92/EC and Directive 2011/61/EU, as last amended by Directive (EU) 2016/1034 of the European Parliament and of the Council, of 23 June 2016 and under Regulation (EU) No 600/2014 of the European Parliament and the Council of 15 May 2014 on markets in financial instruments and amending Regulation (EU) No 648/2012 (the “MiFIR”) which was implemented in Cyprus by the Investment Services and Activities and Regulated Markets Law of 2017 (Law 87(I)/2017), which provide for the provision of Investment Services, the exercise of Investment Activities, the operation of Regulated Markets and other related matters (the “Investment Services and Activities and Regulated Markets Law”), as the same may be modified and amended from time to time.

1.3. As such, the Company is required to comply with Prevention and Suppression of Money Laundering and Terrorist Financing Law of 2007-2018 with amendments (hereinafter also called «AML Law»), the Directive for the Prevention and Suppression of Money Laundering and Terrorist Financing as amended issued by the Commission (hereinafter called «AML Directive»), Directive (EU) 2018/843 (“AMLD V”), amending Directive (EU) 2015/849 (“AMLD IV”) of the European Parliament and the Council on the prevention of the use of the financial system for the purpose of

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money laundering and terrorist financing (hereinafter called «EU Directive»), as the same may be in force from time to time and modified or amended from time to time.

1.4. Preventing money laundering is a major responsibility and aim of regulatory authorities worldwide.

Money laundering allows movement of funds from criminal activities and makes funds available for terrorist activities.

## 2. THE COMPANY'S MONEY LAUNDERING PREVENTION OBLIGATIONS

2.1. At the Company, we are committed to preventing any money laundering activities through our services and as such comply with regulatory requirements such as:

- a. Identifying our Clients (Know Your Clients – KYC Procedure);
- b. Identifying, monitoring and reporting any kind of suspicious transactions;
- c. Maintaining transaction records for a minimum of five (5) years after the termination of our contractual relationships with our Clients;
- d. Training our staff to recognize suspicious transactions and to fulfil all reporting obligations;
- e. Depending on Client location, report any suspicious activities to authorities in several countries.

2.2. The Company reserves the right to collect and validate proof of identification from its Clients prior to account opening and any payments of proceeds based on the above mentioned legal framework.

2.3. Clients should assume that all information provided to the Company is available to the competent regulatory authorities in (a) the country of incorporation of the Company, i.e. the Republic of Cyprus; (b) the country of origin of any funds transmitted to the Company; and (c) the destination country of any funds refunded by or withdrawn from the Company.

2.4. 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.

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

2.6. 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.

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- 2.7. The Company reserves the right to review and/or amend its Money Laundering Prevention Policy, at its sole discretion, whenever it deems fit or appropriate.
- 2.8. Our Money Laundering Prevention Policy is a policy only, it is not part of our Terms and Conditions of Business and is not intended to be contractually binding or impose or seek to impose any obligations on us which we would not otherwise have, but for the above-mentioned Legal Framework (see Section 1.3) as the same may be in force from time to time and modified or amended from time to time.
- 2.9. Should you have a question about our Money Laundering Prevention Policy please direct your questions to our Compliance Department: [legal@ttcm.com](mailto:legal@ttcm.com).

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