



AML Policy

Global Business Company No. 196840 Zendo, 5th Floor, ICONEBENE Rue de L'Institut, Ebene 72201, Mauritius

Registration number:

Investment Dealer License no. GB 22201274 and regulated by FSC, Mauritius

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Introduction

Island Prime 54 Limited (the "Company") is incorporated under the laws of the Republic of Mauritius Island Prime 54 Limited and is licensed by the Financial Services Commission of Mauritius as an Investment Dealer (Full Services Dealer Excluding Underwriting) bearing number GB222012724. The purpose of this policy is to put into place systems and procedures designed to prevent money laundering. This policy would be updated regularly in accordance with legal requirements and recommendations of FATF. The Compliance department of the Company would ensure that the policy shall comply with legal requirements.

This Policy applies to existing clients, prospective clients, clients who have terminated their contractual relationship with the Company and website visitors (hereinafter jointly referred to as the "Clients" or "you") who are accessing or using the Company's website(s) and mobile applications.



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AML Rules

The below rules will be complied by our Client and they undertake to observe them:

- The AML requirements will be observed by the client. The additional documents and information would be provided by the Client when requested by the Company.
- The withdrawal of any assets is carried out only to the account that belongs to you. The withdrawal of Assets to third parties is prohibited. Internal transfers between the Company's customers are also forbidden.
- The Company shall apply client due diligence ("CDD") measures, including identifying and verifying the identity of the clients, being the people giving instructions to the Company to execute securities transactions, when accepting the client.
- The Company is obliged and has the right without obtaining prior consent to share with financial institutions and law enforcement agencies any information about you, as required by applicable law, and you give the Company your consent to these actions. The Company holds for the last seven years at least the records about your transactions as per the laws of Mauritius.
- You undertake to follow the legislation, including international ones, aiming to combat illicit trafficking, financial fraud, money laundering and legalization of funds obtained by illegal means.
- You guarantee the legal origin, legal ownership, and the right to use the assets transferred to your account. In case of the evidence of suspicious transactions in your account, cash replenishments from untrusted sources and / or any actions with attributes of fraud, the Company reserves the right to conduct an internal investigation, to block or close your account, cancel any payment or trading order and to suspend operations on the accounts before the end of the official investigation. When making the decision the Company is guided by the provisions of the applicable law of Mauritius and the related guidelines.
- The Company has the right to request additional information about you if the method of withdrawal is different from the depositing method. The Company also reserves the right to block your account during the investigation if you refused to provide the additional information.



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- In the course of investigation, the Company has the right to request additional copies of
 documents confirming your identity or identity of other individuals in corporate structure,
 as well documents confirming place of living and lawful possession and legal origin of
 funds. The Company also has the right to demand the provision of original documents
 for review in case of any doubts from Company's side.
- The Company does not provide Services to the persons and legal entities who are located at the jurisdictions that are "blacklisted" by FATF.
- The Company refuses to perform the operations that from Company's point of view are suspicious. The use of preventive measures is not the reason for the civil liability of the Company for failure to fulfill obligations to you.
- The Company is not obliged to inform you or other people about the measures taken to
 fulfil the AML/CFT legislation. Also, the Company is not obliged to inform you or other
 people about any suspicions, about the reasons for refusal of execution of your trading
 order, refusal to open the account, need for providing any documents, etc.
- This document is just a summary, which goal is to clarify our rights and our intention to comply with AML regulations.
- This anti-money laundering is an integral part of any agreement concluded between you
 and the Company. Non-compliance with this policy can be a ground for termination of
 the agreement at the Company's sole discretion.