

**ANTI-MONEY LAUNDERING (AML)  
AND COUNTER-TERRORIST FINANCING (CFT)  
POLICY AND PROCEDURES MANUAL  
MXTM LTD**

**Approved by the Board of Directors**

**Effective Date: 12.01.2026**

**Next Review Date: 12.01.2027**

## **1. Company Information**

MXTM LTD is a company incorporated in the Autonomous Island of Mwali (Mohéli), Union of the Comoros.

Company Name: MXTM LTD

Company Registration Number: HV01225484

Brokerage License Number: BFX2025147

Registered Address: Bonovo Road, Office 3, Building 12, Fomboni, Island of Mohéli, Union of the Comoros

Business Activity: Online Brokerage Services

Regulatory Status: Licensed Investment Firm

This Anti-Money Laundering (AML) and Counter-Terrorist Financing (CFT) Policy has been developed in accordance with applicable international laws and regulatory standards to prevent the use of the Company's services for financial crime.

## **2. Appointment of Money Laundering Reporting Officer (MLRO)**

MXTM LTD has appointed a Money Laundering Reporting Officer (MLRO) responsible for the implementation and oversight of the Company's AML/CFT Compliance Programme.

Full Name: Bohdan Danyliuk

Position: AML Compliance Officer

Email: b@MXTM.ai

Phone: +971501642434

Date of Appointment: 12/01/2026

The MLRO reports directly to the Board of Directors and has full authority to investigate suspicious transactions and submit reports to the relevant Financial Intelligence Unit (FIU).

### **3. General Terms**

**MXTM LTD** (hereinafter referred to as the “**Company**”) is committed to maintaining high standards in Anti-Money Laundering (**AML**) and Countering the Financing of Terrorism (**CFT**) procedures.

The Company takes all reasonable and necessary measures to ensure that Clients, Investors, Agents, Intermediaries, and any other parties involved in its business activities are not engaged in any form of unlawful conduct, including, but not limited to, money laundering, terrorist financing, proliferation of weapons of mass destruction, drug trafficking, blackmail, smuggling, concealment of corruption schemes, tax evasion, or cybercrime.

This Policy provides general information to prospective and existing Clients of the Company and outlines the Company’s responsibilities with respect to Client identification and verification, as well as the measures implemented to detect and prevent money laundering and terrorist financing activities.

Prior to opening a trading account on the Company’s platform, the Client acknowledges having read, understood, and agreed to this AML/CFT Policy, as well as the **List of Prohibited Jurisdictions**, as published on the Company’s website.

### **4. Anti-Money Laundering Definition**

Anti-Money Laundering (**AML**) refers to a set of procedures, regulations, and legal measures designed to identify and prevent attempts to disguise the illicit origin of funds obtained through criminal activity.

The concealment or misrepresentation of the source of funds from regulatory authorities or law enforcement agencies may constitute a serious financial crime and may result in severe legal and regulatory consequences.

The continuous development of the global financial system has led to the widespread adoption of AML regulations in response to increasing concerns regarding money laundering and terrorist financing. These measures are enforced internationally, and individuals or entities involved in such activities are subject to scrutiny by competent regulatory and law enforcement authorities.

### **5. AML and CFT Policy Adopted by MXTM LTD**

The Company operates in accordance with applicable laws and regulations aimed at preventing money laundering and terrorist financing, including international AML/CFT standards and relevant regulatory requirements applicable to the Company’s jurisdiction.

Money laundering and the financing of terrorism are treated as criminal offenses under applicable law.

To ensure compliance, the Company has implemented an internal Compliance Programme designed to detect, prevent, and mitigate risks related to money laundering and terrorist financing.

## 5.1 AML / Compliance Department

The AML/Compliance Department is responsible for overseeing the Company's Compliance Programme.

The AML/Compliance Department is entrusted with the following responsibilities:

1. Developing, implementing, and periodically updating the Company's internal AML/CFT policies and procedures.
2. Supervising and facilitating regular training for employees on identifying suspicious transactions and financial behavior.
3. Providing assistance to relevant authorities, including Financial Intelligence Units, in the detection and prevention of suspicious activities, where required by law.
4. Reporting to Senior Management regarding compliance matters and identified financial risks.
5. Conducting Client identification, verification, and ongoing monitoring procedures.

The AML/Compliance Department is headed by a **Money Laundering Reporting Officer (MLRO)** appointed by the Company's management.

## 5.2 Know Your Customer (KYC) Policy

Know Your Customer (KYC) procedures are mandatory and form an integral part of the Company's AML/CFT framework. These procedures are designed to verify the identity of Clients and to mitigate risks associated with fraudulent or unlawful activities.

The opening of anonymous or fictitious accounts is strictly prohibited.

The KYC process may include, but is not limited to, verification of the following:

1. Validity and authenticity of identification documents;
2. Personal information provided by the Client;
3. Contact details, including email address and telephone number;
4. Country of residence and, where applicable, source of funds.

The Company reserves the right to request additional documentation or information where deemed necessary to complete the KYC process. Submission of inaccurate, incomplete, or misleading information may result in refusal of service or termination of the Client relationship.

Client verification may be conducted through third-party service providers specializing in identity verification and data processing. Such providers process personal data in accordance with applicable data protection laws.

All confidential information obtained during the KYC process may be disclosed to third parties only where required or permitted by applicable law.

Any inquiries relating to KYC procedures may be addressed to:

[support@MXTM.ai](mailto:support@MXTM.ai)

### **5.3 Automated Risk-Scoring System**

The Company utilizes an automated risk-scoring system designed to identify Clients and transactions that present an elevated risk of money laundering or terrorist financing.

The Company reserves the right to modify, enhance, or recalibrate this system as necessary.

Client risk profiles are reviewed on a periodic basis by the AML/Compliance Department.

For security and integrity reasons, detailed information regarding the internal risk-scoring methodology is not disclosed publicly.

Based on the results of risk assessments, the AML/Compliance Department implements appropriate mitigation measures.

### **5.4 Employee Awareness and Training**

AML/CFT obligations apply not only to individuals attempting to launder illicit funds but also to employees involved in transaction processing, monitoring, and Client interaction.

Employees receive ongoing training regarding AML/CFT regulations, internal policies, and indicators of suspicious activity.

Any employee who identifies or suspects potential money laundering or terrorist financing activity is required to promptly notify their supervisor and the AML/Compliance Department for further investigation.

### **5.5 Politically Exposed Persons (PEPs)**

A **Politically Exposed Person (PEP)** refers to an individual who has been entrusted with prominent public functions, as well as their immediate family members and close associates.

Clients who qualify as PEPs are required to disclose such status and provide supporting documentation upon request.

The Company reserves the right to conduct enhanced due diligence on PEPs and may engage third-party services to verify PEP status.

Each business relationship involving a PEP is assessed on a case-by-case basis, taking into account applicable legal and regulatory requirements.

## **5.6 Sanctioned Persons**

The Company does not provide services to individuals or entities subject to international sanctions.

A **Sanctioned Person** refers to any individual or entity included in sanctions-related lists, including but not limited to:

- OFAC sanctions lists;
- United Nations Security Council sanctions lists;
- European Union consolidated sanctions lists;
- INTERPOL notices;
- Other applicable international sanctions lists.

Clients who become subject to sanctions are required to immediately notify the Company.

The Company reserves the right to utilize third-party screening services to identify and verify the sanctions status of Clients.

## **5.7 Transaction Monitoring**

The Company conducts ongoing monitoring of client transactions through automated and manual systems.

Monitoring includes:

- Detection of unusual transaction patterns
- Structuring activities
- Rapid movement of funds
- High-value transactions
- Transactions inconsistent with client profile

## **5.8 Suspicious Activity Reporting**

Any employee who identifies suspicious activity must immediately notify the MLRO.

The MLRO shall investigate and determine whether a Suspicious Transaction Report (STR) must be submitted to the relevant Financial Intelligence Unit within 24 to 72 hours in accordance with applicable laws and regulations.

## **6. Recordkeeping**

The Company maintains records in the English language relating to Client identification, verification, and financial transactions, including but not limited to:

1. Information provided by the Client for identity verification;
2. Deposit and withdrawal methods;
3. Information obtained from third-party databases;
4. Records of discrepancies identified during the verification process.

Such records are retained for a minimum period of **six (6) years** from the date of the Client's last transaction or account closure, in accordance with applicable legal requirements.

Records related to suspicious activity are retained for no less than six (6) years.

Any questions regarding this AML/CFT Policy may be directed to: [support@MXTM.ai](mailto:support@MXTM.ai)

## 7. Board Approval

Director  
MXTM LTD  
Name: Bohdan Danyliuk  
Date: 12/01/2026

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Money Laundering Reporting Officer  
MXTM LTD  
Name: Bohdan Danyliuk  
Date: 12/01/2026

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MXTM LTD  
support@MXTM.ai  
Date of Last Revision: 12/01/2026  
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