Policy on Anti-Money Laundering (AML), Combating the Financing of Terrorism (CFT) and Know-Your-Customer (KYC)

Z Trading & Technology Inc.

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INTRODUCTION

Under the rules of the BVI Financial Services Commission, the purpose of this policy is to set the Z Trading & Technology Inc.'s (hereinafter referred to as "Z Trading & Technology Inc.", "the Company", "we", "our" or "us") internal practice, measures, procedures and controls relevant to the prevention of Anti-Money Laundering and Terrorist Financing and Know-Your-Customer principles.
The policy on Anti-Money Laundering (AML), Combating the Financing of Terrorism (CFT) and Know-Your-Customer (KYC) is developed and updated by Money Laundering Reporting Officer (hereinafter the "MLRO" or "reporting officer") who is at the same time the compliance officer of the Company. The policy is applicable and shall be communicated by the reporting officer to all the employees of the Company.
The Policy has been prepared to comply with the provisions of the Regulatory Code, 2009 and Anti-money Laundering and Terrorist Financing Code of Practice, 2008 of the British Virgin Islands and other relevant legislation.

The Financial Investigation Agency ("FIA") is the institution where money laundering and financing of terrorism activities are observed and reported within it. The Financial Investigation Agency Act, 2003 came into force on 1st April 2004.

The MLRO plays a very significant role in the monitoring and implementation of the Company's AML/CFT regime, including monitoring adherence to the Company's internal control systems to ensure full compliance with all enactments relating to AML/CFT.

The employees and professionals of the Company are obliged to report a suspicious activity or transaction to the MLRO in the form established by the Company. The Reporting Officer will make a report to the BVI Financial Investigation Agency (the "FIA") of every suspicious customer or transaction relating to the Company in accordance with the Section 17 of the Anti-money Laundering and Terrorist Financing Code of Practice, 2008.

1. RISK MANAGEMENT

Z Trading & Technology Inc. has adopted and enforced policies, procedures and controls with the objective of detecting and deterring the occurrence of money laundering, terrorist financing, and other illegal activities. Before accepting a potential customer, KYC and due diligence procedures are applied, by examining position, linked accounts, business activities or other risk indicators.
The Reporting Officer is responsible for coordinating and monitoring the Company's AML/CFT Program as well as maintaining the Company's compliance with applicable rules and regulations.

2. INTERNAL SYSTEMS AND CONTROLS

Our company is committed to maintaining a strong and robust Anti-Money Laundering (AML) and Terrorist Financing (TF) framework within our internal systems and controls. We recognize the importance of preventing illicit financial activities and ensuring the integrity of our

operations. Therefore, we have established the following policy to guide our AML and TF efforts:

Risk-Based Approach:

We adopt a risk-based approach within our internal systems and controls to identify, assess, and mitigate the risks associated with money laundering and terrorist financing. This includes conducting a thorough risk assessment of our business operations, products, and customers. Based on this assessment, appropriate controls and measures are implemented to mitigate the identified risks.

Compliance Officer:

We have appointed a dedicated Compliance Officer who is responsible for overseeing our AML and TF compliance program within our internal systems and controls. The Compliance Officer ensures that our policies and procedures are in line with regulatory requirements, regularly updated, and effectively implemented across the organization. They monitor changes in AML and TF laws and regulations, provide guidance and training to employees, and act as a point of contact for regulatory authorities.

Customer Due Diligence (CDD):

We have implemented robust and comprehensive customer due diligence procedures as an integral part of our internal systems and controls. This includes verifying the identity of our customers, conducting risk assessments, and collecting necessary information to establish the legitimacy of customer relationships. Enhanced due diligence measures are applied to high-risk customers.

Enhanced Customer Due Diligence:

In accordance with our dedication to robust anti-money laundering (AML) practices and regulatory compliance, the Company has implemented comprehensive steps to comply with the requirements for adopting enhanced customer due diligence (CDD) as stated in section 20 of the AML Code of Practice.

- Definition of Enhanced Customer Due Diligence:

In line with the AML Code of Practice, 'enhanced customer due diligence' refers to the additional steps performed by the Company, beyond regular customer due diligence, in dealings with applicants for business or customers. These steps are crucial in mitigating the risks associated with money laundering, terrorist financing, and other financial crimes.

- Engagement in Enhanced Customer Due Diligence:

The Company recognizes the importance of engaging in enhanced customer due diligence for higher-risk applicants for business or customers, as well as for transactions, irrespective of the nature or form of the relationship. Enhanced due diligence is implemented to ensure that

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appropriate measures are taken to address the elevated risks associated with such relationships or transactions.

- Additional Measures for Higher-Risk Business Relationships or Transactions:

The Company is committed to adopting additional measures to address higher-risk business relationships or transactions. These measures are necessary to:

a. Increase the level of awareness and knowledge of higher-risk applicants for business or customers, ensuring a thorough understanding of the associated risks.

b. Escalate the level of internal approval for the opening of accounts or establishment of other relationships, ensuring heightened scrutiny and decision-making.

c. Enhance on-going controls and increase the frequency of reviews for established business relationships, ensuring continuous monitoring and risk assessment.

- Consideration of Higher-Risk Factors:

In line with section 20 of the AML Code of Practice, the Company acknowledges that certain factors may indicate a higher risk associated with a business relationship or transaction. These factors include, but are not limited to:

a. Politically exposed persons (PEPs).

b. Complex or unusual business activities, ownership structures, anticipated or volume of transactions, or unusual transaction patterns lacking apparent or visible economic or lawful purpose.

c. Parties located in high-risk countries or those subject to international sanctions, embargoes, or restrictions.

The Company is committed to considering such higher-risk factors when assessing applicants for business or customers, and conducting enhanced due diligence in accordance with regulatory requirements.

By incorporating these measures into our AML Policy, the Company demonstrates its commitment to adopting enhanced customer due diligence practices in compliance with the requirements outlined in section 20 of the AML Code of Practice. We continuously monitor regulatory updates, enhance our procedures as necessary, and allocate appropriate resources to ensure the effectiveness of our enhanced customer due diligence efforts.

- De Minimis Exception:

In accordance with applicable regulations, it is recognized that a person carrying on relevant business is exempted, in the context of a one-off transaction, from the obligation to obtain evidence of the identity of an applicant for business when the amount to be paid by or to the applicant is below $10,000 or the equivalent amount in another currency, unless:

(a) The person carrying on the relevant business possesses reasonable grounds, either initially or subsequently, to believe that:

(i) the transaction is connected to one or more other transactions, and

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(ii) the cumulative amount to be paid by or to the applicant for business, considering all linked transactions, reaches or exceeds $10,000; or

(b) Any person involved in handling the transaction on behalf of the person carrying on relevant business has knowledge or suspicion that the transaction involves money laundering.

It is important to note that even in cases where the exemption applies, vigilance must be exercised, and if there are reasonable grounds to suspect money laundering or linked transactions, appropriate measures must be taken to comply with the anti-money laundering requirements. The Companyis committed to implementing robust monitoring and risk assessment processes to identify and address any potential risks associated with exempted transactions.

Ongoing Customer Due Diligence

In adherence to the ongoing customer due diligence requirements outlined in section 21 of the AML Code of Practice and Guidelines for the Approved Persons Regime App A 3(b)(iii), the Company has established robust procedures for the ongoing monitoring of clients and service providers.

- Higher-Risk Business Relationships:

In cases where an assessment determines that a business relationship presents a higher risk, the Company conducts regular reviews and keeps customer due diligence information up-to-date at least once every year. This ongoing monitoring ensures that the necessary risk mitigation measures remain in place and that the customer's risk profile is accurately reflected.

- Normal or Low-Risk Business Relationships:

For business relationships assessed as presenting normal or low risk, the Company conducts periodic reviews and updates of customer due diligence information at least once every four years. This ongoing monitoring allows for the reassessment of the customer's risk level, ensuring the appropriateness of the existing risk mitigation measures.

- Termination of Business Relationships:

In instances where a business relationship with a customer terminates before the specified review period, the Company reviews and updates the customer due diligence information to the extent possible, as of the date of relationship termination. This ensures that accurate records are maintained even after the termination, facilitating any subsequent assessments or investigations, if required.

- Ongoing Monitoring of High-Risk Existing Customers:

Irrespective of the review periods stated in the AML Code of Practice, the Company applies customer due diligence measures, including enhanced customer due diligence where necessary, and continuously reviews and updates the due diligence information of existing customers determined to present a high risk or engage in material transactions that pose a high risk. This ongoing monitoring ensures that appropriate risk mitigation measures are in place for these high-risk customers.

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The Company has established comprehensive procedures for the ongoing monitoring of clients and service providers, aligning with the Guidelines for the Approved Persons Regime App A 3(b)(iii). These procedures encompass the regular review and update of customer due diligence information, including risk assessments, transaction monitoring, and the identification of any changes that may impact the risk profile of clients and service providers.

By implementing these procedures, the Company demonstrates its commitment to ongoing customer due diligence and the effective monitoring of clients and service providers. These measures contribute to the identification and mitigation of risks associated with money laundering, terrorist financing, and other financial crimes.

Requirements Relating to Politically Exposed Persons

- Compliance with Politically Exposed Persons (PEPs) Requirements:

The Company recognizes the importance of complying with the requirements pertaining to Politically Exposed Persons (PEPs) as outlined in the AML Code of Practice. Accordingly, the following measures are incorporated into our AML Policy:

- Risk-Based Policies and Procedures:

The Company maintains appropriate risk-based policies, processes, and procedures as part of its internal control systems to determine whether an applicant for business or a customer is a politically exposed person. These policies and procedures are designed to identify individuals who hold prominent public positions, their family members, and close associates, and to assess the potential risks associated with these relationships.

- Establishing Source of Funds or Wealth:

When dealing with a politically exposed person, the Company takes reasonable measures to establish the source of funds or wealth concerning such individuals. Enhanced due diligence measures are applied to gain a clear understanding of the origin and legitimacy of their financial resources.

- Senior Management Approval:

The Company ensures that senior management approval is sought before establishing or maintaining a business relationship with a politically exposed person. This step ensures that the decision to engage in such a relationship undergoes appropriate scrutiny and oversight.

- Regular Monitoring of Business Relationships:

The Company maintains a process of regular monitoring for business relationships with politically exposed persons. This monitoring involves ongoing assessments of the relationship, transaction patterns, and changes in the customer's circumstances. This allows for prompt identification of any suspicious activities or potential risks associated with the relationship.

- Adequate Supervisory Oversight:

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In circumstances where junior staff interact with politically exposed persons, the Company ensures that adequate supervisory oversight is in place. This oversight ensures that all interactions and transactions involving politically exposed persons are conducted in line with applicable laws, regulations, and internal policies.

- Treatment of Customers Becoming Politically Exposed Persons:

The Company ensures that the requirements outlined above (paragraphs (a) to (d)) also apply in relation to a customer who becomes a politically exposed person during the course of an existing business relationship. Enhanced due diligence measures are implemented promptly upon the customer's elevation to PEP status.

- Enhanced Customer Due Diligence for Third-Party Representation:

When a third party acts on behalf of a politically exposed person in establishing a business relationship or performing a transaction, the Company performs the necessary enhanced customer due diligence measures as if the business relationship or transaction is being made directly with the politically exposed person.

- Duration of PEP Status:

A customer who no longer holds the post or relationship that qualified them as a PEP ceases to be treated as a PEP after a period of two years from the day they cease to qualify. However, the Company reserves the right, based on a careful assessment, to continue treating the customer as a PEP for a relevant period during the currency of the relationship, not exceeding 10 years from the date the customer ceased to qualify as a PEP.

Failure to comply with these requirements may result in an offense, subject to legal consequences as outlined in the Proceeds of Criminal Conduct Act.

By incorporating these measures into our AML Policy, the Company demonstrates its commitment to effectively mitigate the risks associated with politically exposed persons and ensures compliance with regulatory requirements regarding enhanced due diligence for PEPs.

Verification of Legal Persons

To comply with the requirements set forth in the AML Code of Practice, the Company shall implement comprehensive measures for the identification and verification of legal persons. These measures apply to various scenarios involving legal persons, including their role as applicants for business, beneficial owners or controllers of applicants, or third parties on whose behalf an applicant is acting. The following detailed procedures are followed:

- Identification and Verification Measures:

(a) When a legal person is an applicant for business in its own right:

The Company undertakes appropriate identification and verification measures to establish the legal person's identity and ensure compliance with AML regulations.

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This includes obtaining and verifying the legal person's full name, official registration or identification number, date and place of incorporation, and the address of its registered office.

(b) When a legal person is a beneficial owner or controller of an applicant for business:

The Company conducts thorough due diligence to identify and verify the legal person's status as a beneficial owner or controller.

This involves obtaining and verifying relevant information such as the legal person's full name, ownership or control structure, and the extent of their influence or control over the applicant.

(c) When a legal person is a third party (underlying customer) on whose behalf an applicant is acting:

The Company applies identification and verification measures to establish the legal person's identity, assess their risk profile, and ensure compliance with AML regulations.

This includes obtaining and verifying necessary information, such as the legal person's full name, registration details, and the nature of their relationship with the Company.

- Required Information for Legal Persons:

The Company obtains and verifies specific information to ensure accurate identification and assessment of legal persons. This includes:

(a) Full name of the legal person.

(b) Official registration or identification number.

(c) Date and place of incorporation, registration, or formation.

(d) Address of the registered office in the country of incorporation, as well as any separate mailing address.

(e) In cases where applicable, the address of the registered agent for correspondence purposes.

(f) Principal place of business and a description of the type of business engaged in.

(g) Identification of each director, including individuals owning 10% or more of the legal person.

- Enhanced Due Diligence for Higher-Risk Legal Persons:

When a legal person or the product/service channels associated with them are assessed as presenting a higher level of risk, the Company performs enhanced customer due diligence measures. This includes:

- Conducting a thorough risk assessment of the legal person and their activities.
- Obtaining and verifying additional relevant information deemed necessary based on the risk assessment.
- Enhanced scrutiny and ongoing monitoring of the business relationship with the legal person.

- Required Documents for Verification:

(a) Companies:

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Memorandum and articles of association or equivalent governing constitution.

Resolutions, bank mandates, signed application forms, or valid account-opening authorities, including full names and specimen signatures of directors.

Copies of powers of attorney or other authorities given by the directors.

A signed director's statement clarifying the nature of the company's business.

Any additional essential documents considered necessary for the verification process.

(b) Partnerships:

Partnership agreement.

Full name and current residential address of each partner and relevant manager involved in the business relationship.

Additional relevant personal information as deemed necessary by the Company.

Date and place of birth, nationality, telephone number, facsimile number, occupation, employer, and specimen signature of each partner or senior officer authorized to act on behalf of the partnership.

(c) Other Legal Persons:

Full name and current residential address of the applicant for business.

Relevant personal information of the individual acting for the applicant.

Additional information as considered necessary by the Company to establish proper identification and compliance.

- Alternative Means of Verification:

In cases where certain verification requirements are inapplicable or can be achieved through alternative means, and provided that the Company is satisfied that there is no indication of money laundering, terrorist financing, or other criminal financial activity, a business relationship may be established with the legal person. The following steps are taken:

The Company records its satisfaction and the reasons for relying on alternative means of verification.

The recorded information is made available for inspection by relevant authorities or whenever requested by the Agency or Commission.

Failure to comply with the requirements outlined in this section may result in an offense, subject to legal consequences as stated in the Proceeds of Criminal Conduct Act.

By incorporating these detailed measures into our AML Policy, the Company ensures comprehensive and effective verification of legal persons, mitigates the risks associated with money laundering, terrorist financing, and other financial crimes, and remains compliant with relevant regulatory obligations.

Risk-Based Customer Due Diligence:

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Company recognizes the importance of implementing risk-based customer due diligence (CDD) policies, processes, and procedures to effectively manage Anti-Money Laundering (AML) risks. As part of our commitment to combating money laundering and terrorist financing, we adopt a risk-based approach to determine the level of due diligence required for customers.

Determining Low-Risk Customers:

In accordance with the risk-based approach, our financial company may determine that certain customers or transactions carry low risk in terms of the business relationship. To make such determinations, the following factors may be taken into account:

(a) Source of fixed income: This includes regular income streams such as salary, superannuation, and pension.

(b) Financial institution subject to AML and terrorist financing requirements: If the customer is a financial institution, it should be subject to anti-money laundering and terrorist financing requirements that are consistent with the FATF Recommendations and are supervised for compliance with such requirements.

(c) Publicly listed companies subject to regulatory disclosure requirements: Customers who are associated with publicly listed companies that are subject to regulatory disclosure requirements may be considered low risk.

(d) Government statutory bodies: Customers who are government statutory bodies can be deemed low risk.

(e) Life insurance policies with annual premiums below $1,000: Customers holding life insurance policies where the annual premium does not exceed $1,000 may be considered low risk.

(f) Insurance policies for pension schemes without surrender clauses: Customers with insurance policies for pension schemes that do not contain surrender clauses and cannot be used as collateral may be considered low risk.

(g) Beneficial owners of pooled accounts held by non-financial businesses and professions: If beneficial owners of pooled accounts held by non-financial businesses and professions are subject to anti-money laundering and terrorist financing requirements, and effective systems for monitoring and compliance are in place, they may be considered low risk.

(h) Applicants for business or customers resident in foreign jurisdictions: Customers resident in foreign jurisdictions may be considered low risk if the Commission is satisfied that the jurisdictions are in compliance with and effectively implement the FATF Recommendations.politi

(i) Group companies subject to AML and terrorist financing requirements: In the case of a body corporate that is part of a group, the body corporate should be subject to and properly and adequately supervised for compliance with anti-money laundering and terrorist financing requirements consistent with the FATF Recommendations.

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(j) Consideration of overall risk: The entity will consider, based on the circumstances of the customer and its own anti-money laundering and terrorist financing obligations, whether the customer constitutes little or no risk.Enhanced Measures for Higher AML Risks:

While certain customers may be deemed low risk, Company understands that risk levels may vary among customers and transactions. Therefore, for customers identified as presenting higher AML risks, enhanced measures will be implemented to manage these risks effectively. These measures may include:

a. Enhanced Due Diligence (EDD): For customers deemed to have higher AML risks, Company will conduct enhanced due diligence to gather additional information, verify the source of funds, and assess the nature of the business relationship more thoroughly. EDD measures may involve more stringent identity verification, background checks, and ongoing monitoring of transactions and activities.

b. Transaction Monitoring: Company will employ advanced transaction monitoring systems and processes to identify and analyze suspicious or potentially illicit activities. This includes monitoring for unusual patterns, large or complex transactions, and transactions involving high-risk jurisdictions or sectors.

c. Ongoing Monitoring and Review: Customers classified as higher risk will be subject to continuous monitoring and periodic reviews. This ensures that any changes in risk profiles or suspicious activities are promptly identified and appropriate actions are taken.

d. Training and Awareness: Company will provide regular training and guidance to employees involved in customer due diligence processes. This training will emphasize the importance of risk assessment, the application of enhanced measures, and the identification and reporting of suspicious activities.

Compliance with Regulatory Standards:

Company is committed to ensuring that our AML policies and practices are consistent with the FATF Recommendations and other relevant anti-money laundering and terrorist financing requirements. We will continuously monitor regulatory developments and update our policies and procedures accordingly to meet evolving industry standards.

Documentation and Record Keeping:

All risk assessments, determinations, and actions taken regarding customer due diligence and the application of enhanced measures will be documented and retained in accordance with our record keeping obligations as outlined in applicable regulations. These records will be made available for review by relevant regulatory authorities upon request.

By implementing a risk-based approach and considering factors such as fixed income sources and compliance with AML requirements, Company ensures effective management of AML risks. We are committed to applying enhanced measures for higher-risk customers, maintaining robust transaction monitoring systems, and adhering to regulatory standards to safeguard our business from the threats of money laundering and terrorist financing.

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KYC Requirements

We have the responsibility against regulators regarding global anti-money laundering and financing terrorism regulations. For this reason, we have strict rules to know our customers and they are required to submit proof of their identity. For each customer the following controls and measures are taken by the Z Trading & Technology Inc.:

- identification and verification of the valid identity and address details of (potential) customers, acceptable to the legal authorities, before performing a transaction and during the course of a continuous business relation;

- consistency of the income levels of customers and the financial services they perform/request with their business, the general course of action and sources of income of the customer type, in which they are included; and

- the possibility of the customers being included on national/international sanctions lists.

Detailed KYC Procedure has been explained in the Section 3.

Ongoing Monitoring:

We maintain a system for ongoing monitoring of customer transactions and activities within our internal systems and controls to detect and report suspicious transactions or behaviors. This includes the use of automated monitoring systems, real-time transaction monitoring, and periodic reviews of customer accounts. Any unusual or suspicious activities are promptly reported to the relevant authorities. On the other hand we closely follow the activities of our service providers and monitor whether they perform their duties in accordance with the applicable law.

Record-Keeping:

For all accounts, Z Trading & Technology Inc. has systems in place to detect the unusual or suspicious patterns of an activity. Certain types of transactions alert to the possibility that the customer is conducting unusual or suspicious activities. There are also intensified monitoring for the accounts with a higher risk. The Company will set key indicators for such accounts, taking into consideration the background of the customer, such as the country of origin and source of funds, the type of transactions involved, and other risk factors. Z Trading & Technology Inc. determines the list of high-risk third countries, presenting a money laundering/terrorist financing risk.

Z Trading & Technology Inc. maintains records on a current and accurate basis which are subject to periodic regulatory examination. The Company's filing system for records, whether stored in files or electronic media, is designed to meet the Company's policy, business needs, and regulatory requirements.

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In this respect, the company's IT infrastructure will also be set up in a way that is suitable for fulfilling AML-CFT obligations. All transactions and information of customers will be electronically available and accessible to those who fulfil AML-CFT obligations. The company's IT infrastructure will make it possible to keep a backup of all data in another secure location. The basics of the filing system are as follows:

- Arranging for easy location, access and retrieval.
- Having available the means to provide legible true and complete copies.
- For records stored on electronic media, back-up files are made and such records stored separately.
- Reasonably safeguarding all files, including electronic media, from loss, alteration or destruction.
- Limiting access by authorized persons to Z Trading & Technology Inc.'s records, and ensuring that any non-electronic records that are electronically reproduced and stored are accurate reproductions.
- The Company will maintain all required records on-site for the first two years and then offsite for the next three in an easily accessible location.

Z Trading & Technology Inc. will keep the following customer records:

- Copies of the evidential material of the customer identity.
- Relevant evidential material and details of all business relations and transactions including documents for recording transactions in the accounting books.
- Relevant documents of correspondence with the customers and other persons with whom they keep a business relation.
- Daily customer records containing the funds in the account (net of any commissions and fees); open trade equity (the net profits and losses on open trades); and account balance (funds in the account plus or minus open trade equity).

Reporting Suspicious Activities:

We have established procedures for reporting suspicious activities within our internal systems and controls. Our employees are trained to recognize and report any transactions or behaviors that raise suspicions of money laundering or terrorist financing. We ensure confidentiality and protection for employees who make such reports, and non-retaliation measures are in place. The reporting form for suspicious activities or transactions is created by Z Trading & Technology Inc. which complies with the requirements of section 55 of the Anti-money Laundering and Terrorist Financing Code of Practice, 2008. In case a suspicious activity or transaction is detected, The Financial Investigation Agency of BVI will be notified immediately with the supportive documents.

We maintain comprehensive records of customer transactions within our internal systems and controls, including identification documents, transaction details, and communication records. These records are securely stored and retained for the required period as mandated by applicable regulations. Proper record-keeping allows us to demonstrate compliance and facilitates effective reporting and auditing processes.

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Employee Training and Awareness:

We provide regular training and awareness programs to our employees within our internal systems and controls to ensure their understanding of AML and TF regulations, risks, and obligations. Training sessions cover topics such as recognizing red flags, reporting requirements, and the importance of compliance. We promote a culture of compliance and encourage employees to remain vigilant and proactive in detecting and preventing financial crimes. Detailed KYC Procedure has been explained in the Section 3.

In alignment with our unwavering commitment to combat money laundering and adhere to regulatory obligations, the AML Policy of Companyincorporates comprehensive procedures to ensure the effective identification and verification of customers, diligent record-keeping obligations, prompt recognition of suspicious transaction reports, and meticulous internal reporting requirements to the designated Money Laundering Reporting Officer (MLRO). Furthermore, this policy provides clear guidelines for the appropriate handling of customers in cases where a suspicious transaction report has been filed against them, which subsequently necessitates reporting to the Financial Intelligence Authority (FIA). The following procedures are included in annual employee training activities:

- Identification and Verification of Customers:

robust procedures for the thorough identification and verification of customers. These procedures are designed to ascertain the true identities of our customers, assess their risk profiles, and ensure compliance with Know Your Customer (KYC) and Customer Due Diligence (CDD) requirements. These measures enable us to establish and maintain accurate and up-to-date customer records, mitigating the risk of facilitating illicit activities.

- Record Keeping Obligations:

The importance of diligent record keeping in accordance with applicable laws and regulations. The specific requirements for maintaining comprehensive and accurate records of customer transactions, identity verification documents, and any other relevant documentation. These records are retained for the prescribed periods as mandated by regulatory authorities, facilitating audits, investigations, and reporting obligations.

- Recognition of Suspicious Transaction Reports:

The procedures for promptly recognizing and appropriately handling suspicious transaction reports. Clear criteria and red flag indicators to identify transactions or activities that are potentially associated with money laundering, terrorist financing, or other illicit practices. Employees are trained to exercise heightened vigilance, enabling them to detect and report suspicious activities in a timely manner.

- Internal Reporting Requirements to the MLRO:

The importance of internal reporting of suspicious transactions to the designated MLRO. The reporting channels, formats, and timelines for employees to follow when submitting reports.

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This facilitates effective communication and enables the MLRO to thoroughly investigate reported suspicions, assess risk levels, and determine the appropriate course of action in compliance with regulatory obligations.

- Handling Customers with Suspicious Transaction Reports to the FIA:

In cases where a suspicious transaction report has been made against a customer, our policy outlines the specific procedures for managing such customer relationships. It emphasizes the need for enhanced due diligence measures, continuous monitoring, and, when necessary, reporting the suspicious activity to the FIA in accordance with regulatory requirements. These procedures ensure the diligent handling of customers while upholding our commitment to combat financial crime.

By incorporating these detailed procedures into our AML Policy and providing training on employees on these topics, we establish a robust framework to proactively mitigate the risks associated with money laundering and illicit financial activities.

Internal Controls and Independent Audit:

We maintain robust internal controls and procedures within our internal systems and controls to ensure the effectiveness of our AML and TF program. Internal audits are conducted periodically to assess the adequacy of our controls and procedures, identify any deficiencies, and implement necessary improvements. We also engage independent auditors to conduct external reviews and assessments of our AML and TF framework.

- Enhanced Focus on High-Risk Operations and Vulnerable Areas

The Company recognizes the importance of addressing and mitigating the risks posed by money launderers, terrorist financiers, and other criminals. To achieve this, our AML Policy includes an enhanced focus on the following matters within our written system of internal controls:

- Operations, Products, and Services:

The Company identifies and evaluates specific operations, products, and services that are more vulnerable to abuse by money launderers, terrorist financiers, and other criminals. These high-risk areas are subject to enhanced scrutiny and measures to detect, prevent, and report any suspicious activities associated with them.

- Customer Risk Assessment:

The Company conducts thorough risk assessments to identify customers who may pose higher risks in terms of money laundering, terrorist financing, or other criminal activities. This includes categorizing customers based on factors such as their business activities, transaction patterns, and geographic locations.

- Geographic Risk Assessment:

The Company evaluates geographic locations where the entity operates or has business relationships, considering the specific risks associated with those areas. This assessment takes

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into account factors such as high-risk jurisdictions, countries with weak AML/CFT controls, and regions known for money laundering or terrorist financing activities.

- Customer Due Diligence (CDD):

The Company applies robust customer due diligence measures, including the verification of customer identities, source of funds, and beneficial ownership, with a particular emphasis on customers involved in high-risk operations or from vulnerable geographic locations. This enables us to better understand our customers, detect any suspicious activities, and prevent illicit transactions.

- Transaction Monitoring:

The Company implements an effective system for monitoring customer transactions, focusing on high-risk operations, products, services, and geographic locations. This includes employing automated monitoring systems, utilizing transactional analysis techniques, and setting predefined thresholds for identifying and reporting suspicious transactions.

- Enhanced Reporting and Escalation:

The Company establishes clear protocols for reporting and escalating suspicious activities, ensuring that relevant authorities are promptly informed. This includes maintaining robust internal reporting mechanisms and establishing channels for communication with regulatory bodies, such as the Financial Intelligence Agency.

- Ongoing Training and Awareness:

The Company provides regular training and awareness programs to employees, ensuring they understand the risks associated with high-risk operations and vulnerable areas. This includes educating staff on red flags, suspicious activity indicators, and their responsibilities in identifying and reporting potential money laundering, terrorist financing, or other criminal activities.

By incorporating these enhanced focus areas into our AML Policy and written system of internal controls, the Company demonstrates its commitment to proactively addressing vulnerabilities, detecting and preventing illicit activities, and upholding the highest standards of compliance with anti-money laundering, counter-terrorism financing, and other relevant regulations.

Senior Management Oversight:
Our senior management actively supports and oversees our AML and TF program within our internal systems and controls. They provide the necessary resources and support to maintain a strong control environment and promote a culture of integrity and ethical behavior throughout the organization. Senior management is responsible for ensuring that employees are aware of their AML and TF obligations and are provided with the necessary training and resources to fulfill them.

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Review and Continuous Improvement (continued):
We regularly review our AML and TF policies, procedures, and controls within our internal systems to ensure their effectiveness and alignment with evolving regulatory requirements. We conduct periodic assessments of our risk assessment framework to identify emerging risks and make necessary adjustments. Feedback from internal audits and independent reviews is used to enhance our AML and TF program, promoting a culture of continuous improvement.

Reporting and Non-Retaliation:
We encourage employees to report any concerns, suspicions, or potential breaches of our AML and TF policies and procedures within our internal systems. We have established a confidential reporting mechanism to facilitate the reporting of such matters. We strictly prohibit any form of retaliation against employees who report in good faith, and we ensure that appropriate measures are in place to protect whistleblowers in accordance with applicable laws and regulations.

Cooperation with Law Enforcement and Regulatory Authorities:
We maintain a cooperative and collaborative approach with law enforcement agencies and regulatory authorities within our internal systems. We promptly respond to requests for information and provide necessary assistance in investigations. We understand the importance of information sharing and work closely with relevant authorities to contribute to the overall efforts of combating financial crimes.

External Relationships:
We exercise caution and due diligence when establishing and maintaining business relationships with external parties within our internal systems. We assess the AML and TF policies and controls of these entities to ensure that they meet our standards and are compliant with relevant regulations. We also maintain ongoing monitoring and periodic reviews of these relationships to ensure their continued compliance.

Record of Compliance:
We maintain a record of our AML and TF compliance efforts within our internal systems, including documentation of policies, procedures, training programs, risk assessments, and internal and external audit reports. These records serve as evidence of our commitment to AML and TF compliance and provide documentation for internal reviews and regulatory inspections.

Communication and Awareness:
We communicate our AML and TF policies, procedures, and expectations to all employees within our internal systems, ensuring that they are aware of their roles and responsibilities in preventing money laundering and terrorist financing. We promote a culture of awareness and vigilance by regularly disseminating relevant information, updates, and case studies to enhance employees' understanding of evolving AML and TF risks and typologies.

Annual Review:

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We conduct an annual review of our AML and TF policy within our internal systems to assess its effectiveness, identify areas for improvement, and incorporate any regulatory changes or emerging risks. The review includes an evaluation of our training programs, risk assessment methodologies, internal controls, and the overall performance of our AML and TF framework.

By adhering to this Anti-Money Laundering Policy, we demonstrate our commitment to maintaining strong internal systems and controls, preventing money laundering and terrorist financing activities, and upholding our legal and ethical responsibilities.

3. KYC REQUIREMENTS

We have the responsibility against regulators regarding global anti-money laundering and financing terrorism regulations. For this reason, we have strict rules to know our customers and they are required to submit proof of their identity. For each customer the following controls and measures are taken by the Z Trading & Technology Inc.:

- identification and verification of the valid identity and address details of (potential) customers, acceptable to the legal authorities, before performing a transaction and during the course of a continuous business relation;
- consistency of the income levels of customers and the financial services they perform/request with their business, the general course of action and sources of income of the customer type, in which they are included; and
- the possibility of the customers being included on national/international sanctions lists.

The following documents shall be provided by the individual customers (natural person):

1. The Copy of Passport with the photograph, full name, nationality, date and place of birth, date of issue and the term of validity, number, country of issuance and signature. In case the Copy of Passport cannot be provided, the Clients shall provide the Copy of ID or driving license that contains all the information mentioned above. All copies of these documents should be certified. The certification should state that this is a true copy of the original.

2. A public utility bill (electricity, gas, water etc.) or bank statement with the date indication (not later than the last three months), name, permanent place of residence and postal address.

The following documents shall be provided by the legal entities:

1. The Copy of the Company Registration

2. The Copy of Memorandum of Association and/or Articles of Association of the Company

3. The Copy of Certificate that confirms legal authorities of the Company's shareholders and directors with their names indication

4. The Document with the address of the Company registered office.

5. The Copies of Passports of all of the Company's Shareholders and Directors.

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6. The Documents that confirm the permanent place of residence of the Company's shareholders and directors.

All these documents shall be provided by the customers via uploading them into the customers' personal account. The Company has the right to demand all necessary documents from the Customers at any time at its discretion by way of sending the requests via e-mail. If the customers fail to submit the identity verification documents to the Company with, the Company will have the right to reject any of the Customers' requests.

The company may open an account within the company for its customers whose identity is identified and verified in the above-mentioned procedure. To this account, customers can send money via ordinary bank transfer as well as with cryptocurrencies. Likewise, customers can withdraw money from their customer account via cryptocurrencies upon their request. However, in order to make deposits and withdrawals via cryptocurrencies the following conditions should be met:

- Sender/recipient of every transaction will be identified;
- The digital wallet must be registered under the same name as the customer's name registered in the company's system.
- Each customer will be allowed to make transactions with a maximum of two separate digital wallets registered in his name. No transfers or withdrawals will be accepted except for the two wallets registered in the system.
- All customers and all their cryptocurrency transactions will be recorded.
- Periodic reporting of transactions regarding the use of Cryptocurrency will be made.
- If it is determined that the customer has made a transaction through a digital wallet that is not registered in his name, a suspicious transaction will be reported to the relevant authorities and transactions on behalf of the customer will be terminated.

The AML Reporting Officer may specifically check and verify the application of KYC procedures and comment on the lapses observed in this regard.

4. AML/CFT POLICY

Z Trading & Technology Inc. will introduce necessary policies and procedures to avoid the risk of possible money laundering or the financing of terrorist and related activities. The procedures set up by the Company for AML are as follows:

- To inquire about the source of the customer's assets and income to determine whether the inflow and outflow of money and securities are consistent with the customer's financial status.
- To gain an understanding of what the customer's likely trading patterns will be to detect any deviations from the patterns at a later date.

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- Employees responsible for final approval of new accounts will receive sufficient training to be able to identify additional accounts that may also require more than the minimal customer identification verification requirements.

Identification of Suspicious Financial Transactions

As stated above, Z Trading & Technology Inc. has designated the Compliance Officer as its AML Reporting Officer. In this capacity, the Reporting Officer will be responsible for coordinating and monitoring the Company's AML Program as well as maintaining the Company's compliance with applicable AML rules and regulations. The Reporting Officer will review any suspicious activity, which has been observed and reported by employees. The Reporting Officer will also report information related to cash and suspicious transactions if detected to the Directors.

Some of suspicious activities or transactions that will be scrutinized by the Reporting Officer and that may indicate money laundering activity can be listed as follows:

- Customers who wish to maintain a number of trustee of Customers accounts which do not appear consistent with their type of business, including transactions which involve nominee names.
- Customers who have numerous accounts and pay in amounts of cash to each of them in circumstances in which the total of credits would be a large amount.
- Any individual or company whose account shows virtually no normal personal banking or business-related activities, but is used to receive or disburse large sums which have no obvious purpose or relationship to the account holder and/or his business (e.g. a substantial increase in turnover on an account)
- Reluctance to provide normal information when opening an account, providing minimal or fictitious information or, when applying to open an account, providing information that is difficult or expensive for the Company to verify.
- Customers who appear to have accounts with several banks within the same locality, especially when the Company is aware of a regular consolidation process from such accounts prior to a request for onward transmission of the funds.
- Matching of payments out with credits paid in by cash on the same or previous day.
- Paying in large third-party cheques endorsed in favour of the customer.
- Large cash withdrawals from a previously inactive account, or from an account which has just received an unexpected large credit from abroad.
- Customers who together, and simultaneously, use separate tellers to conduct large cash transactions or foreign exchange transactions.
- Companies representatives avoiding personal contact with the Company.
- Substantial increases in deposits of cash or negotiable instruments by a professional firm or company, using customer's accounts or an in-house company or trust accounts, especially if the deposits are promptly transferred to/from other customer's or trust accounts.
- Customers who decline to provide information that in normal circumstances would make the Customer eligible for credit or for other banking services that would be regarded as valuable.

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- A large number of individuals making payments into the same account without an adequate explanation.
- The customer introduced by an overseas branch or affiliate based in countries where the production of drugs or drug trafficking may be prevalent.
- Use of Letters of Credit and other methods of trade finance to move money between countries where such trade is not consistent with the customer's usual business.
- Customers who make regular and large payments, including wire transactions, that cannot be clearly identified as bona fide transactions to, or receive regular and large payments from countries which are commonly associated with the production, processing or marketing of drugs.
- Building up of large balances, not consistent with the known turnover of the customer's business, and subsequent transfer to the account(s) held overseas.
- Unexplained electronic fund transfers by customers on an in and out basis or without passing through an account.
- Frequent requests for digital currencies, foreign currency drafts or other negotiable instruments to be issued.
- Frequent paying in of digital currencies (if accepted), foreign currency drafts particularly if originating from overseas.
- Numerous wire transfers received in an account when each transfer is below the reporting requirement in the remitting country.
- Changes in the Company’s employees characteristics, e.g. lavish lifestyles.
- Any dealing with an agent where the identity of the ultimate beneficiary or counterparty is undisclosed, contrary to the normal procedure for the type of business concerned.

Z Trading & Technology Inc. ensures that the Reporting Officer has sufficient time to undertake and perform his or her duties; provides the Reporting Officer with sufficient resources, including financial and human resources as may be necessary, to enable him or her to properly and efficiently discharge his or her duties; affords the Reporting Officer direct access to the Company’s senior management with respect to matters concerning the prevention of money laundering and terrorist financing.

5. EMPLOYEE TRAINING

In accordance with the laws, our financial services company is committed to providing comprehensive training to our employees to effectively combat money laundering and terrorist financing. We recognize the importance of training in fostering awareness and understanding of these critical issues. Our training program adheres to the following provisions:

Training Obligations:

(a) We ensure that our employees receive appropriate and proportionate training in accordance with the standards and levels mandated by the Anti-Money Laundering Regulations. This training covers topics related to money laundering and terrorist financing.

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(b) We employ suitable systems and procedures to test the awareness and understanding of our employees regarding the training they receive.

Inclusivity of Training:

Our training program is not limited to specific classes or ranks of employees. While key employees, who are essential to our anti-money laundering and terrorist financing regime, receive specialized training, we recognize that training is relevant to all employees.

Extension of Training:

(a) Training requirements outlined in subsection (1) also extend to employees who may not be considered key to our anti-money laundering and terrorist financing regime. However, the scope of training for such employees may be limited to basic anti-money laundering and terrorist financing issues.

(b) Temporary and contract employees, including those working for third parties under an outsourcing arrangement, are also included in our training program whenever feasible.

Exemptions:

(a) Sole traders who do not employ any staff and carry on a relevant business as a professional are exempt from these training requirements.

(b) Entities that do not employ any staff in the Virgin Islands but have their relevant business managed by another entity in the Virgin Islands, either solely or in conjunction with persons outside the Virgin Islands, are also exempt.

(c) Funds registered or recognized under the Securities and Investment Business Act, and any other professionals or entities exempted in writing by the Commission upon application, are exempt from these requirements.

Training Measures:

(a) Our financial services company is committed to providing employees with adequate training in the recognition and handling of transactions.

(b) The training is tailored to the specific responsibilities of each employee, ensuring a thorough understanding of the issues related to money laundering and terrorist financing.

(c) Training sessions are conducted at an appropriate frequency, with a minimum requirement of once every year, in accordance with the Anti-Money Laundering Regulations. The frequency of training is determined based on the level of risk associated with our business operations.

(d) The design of our training program includes assessments that test employee knowledge of anti-money laundering and terrorist financing issues in line with established standards.

Employee Competence and Probity:

We assess the competence and probity of our employees during the recruitment process and monitor their competence and probity continuously, particularly during role changes.

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In alignment with our commitment to maintaining the highest standards of competence and probity within our organization, the AML Policy of Company incorporates a robust framework to diligently assess the competence and probity of potential candidates during the recruitment process. This framework aims to ensure that individuals joining our organization possess the necessary qualifications, skills, integrity, and ethical conduct required to effectively fulfill their roles in anti-money laundering efforts.

- Competence Assessment:

During the recruitment process, we undertake a thorough evaluation of candidates' qualifications, knowledge, and relevant experience pertaining to anti-money laundering regulations and practices. This includes assessing their understanding of AML laws, regulations, and industry best practices. We may conduct interviews, review resumes, verify certifications or educational qualifications, and administer relevant assessments or tests to assess their competence in AML-related areas.

- Probity Assessment:

In addition to assessing competence, we place a strong emphasis on evaluating the probity and integrity of potential candidates. This involves conducting comprehensive background checks, including criminal record checks, employment history verification, and reference checks. These checks enable us to evaluate the candidate's past conduct and ascertain their suitability for positions involving sensitive financial activities.

- Ethical Conduct Evaluation:

As part of the recruitment process, we assess the ethical conduct of candidates, focusing on their adherence to high moral and professional standards. We evaluate their previous work experience, professional reputation, and any past disciplinary actions to gain insights into their ethical behavior. This evaluation helps us identify individuals who demonstrate a commitment to ethical practices and possess the integrity required to maintain a strong AML compliance culture.

- Ongoing Professional Development:

Our commitment to competence extends beyond the recruitment process. Once candidates are hired, we provide ongoing training and professional development opportunities to ensure their AML knowledge and skills remain up-to-date. This includes participation in relevant seminars, workshops, webinars, and other educational programs aimed at enhancing their understanding of emerging AML trends, regulatory changes, and evolving best practices.

By incorporating these comprehensive assessments into our recruitment process, we strive to attract and select candidates who demonstrate a strong commitment to competence, probity, and ethical conduct. This approach supports our ongoing efforts to establish a robust AML compliance framework, safeguard our organization, and effectively combat money laundering and other financial crimes.

Employee Termination or Dismissal:

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(a) If an employee's termination or dismissal is attributed to their competence in complying with anti-money laundering and terrorist financing requirements or their probity, our company promptly notifies the Agency and the Commission in writing within 7 days. The notification includes detailed information to ensure a comprehensive understanding of the circumstances and reasons for the termination or dismissal.

(b) No action regarding an employee's probity is taken in a manner that would constitute tipping off the employee, as defined by relevant legislation.

Non-compliance:

Our financial services company is dedicated to upholding the highest standards of anti-money laundering and terrorist financing practices. By providing comprehensive training to our employees, we aim to ensure their competence, awareness, and understanding of the risks and challenges associated with money laundering and terrorist financing.

We recognize the dynamic nature of financial crimes and the evolving techniques used by criminals. Therefore, our training program is designed to stay current with regulatory requirements and industry best practices. We strive to create a culture of compliance and vigilance throughout our organization, emphasizing the importance of reporting any suspicious activities or transactions.

To support the effectiveness of our training program, we have implemented systems and procedures to regularly assess and test our employees' knowledge and understanding of anti-money laundering and terrorist financing issues. This allows us to identify areas for improvement and provide additional training or support as necessary.

Furthermore, we understand that training is not limited to permanent employees. Temporary and contract employees, as well as third-party employees involved in anti-money laundering and terrorist financing functions under an outsourcing arrangement, are included in our training initiatives whenever feasible. We believe that everyone involved in our operations should possess a basic understanding of these critical issues to maintain the integrity of our business and the financial system as a whole.

While certain exemptions may apply to specific circumstances, we are committed to ensuring that all relevant employees receive appropriate and ongoing training. Our training efforts are aligned with regulatory requirements, encompassing the recognition and handling of transactions, risk assessment, customer due diligence, suspicious transaction reporting, and other essential aspects of anti-money laundering and terrorist financing prevention.

By actively engaging in training and promoting a strong compliance culture, we strive to safeguard our organization, clients, and the broader financial system from the risks associated with money laundering and terrorist financing. Continuous education and awareness-building among our employees are key pillars of our comprehensive anti-money laundering and terrorist financing framework.

Training Plan:

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To foster a strong culture of compliance and continuous improvement in our anti-money laundering (AML) efforts, the AML Policy of Companyincludes a comprehensive staff training plan. This plan encompasses the type and frequency of training sessions, a succession plan for key personnel and new staff, and identifies the responsible party for providing staff training.

- Staff Training Plan:

The Company has adopted an AML Training Plan. Our staff training plan is designed to ensure that all employees receive the necessary knowledge and skills to fulfill their AML-related responsibilities effectively. It covers a wide range of topics, including but not limited to AML laws, regulations, risk identification and mitigation, customer due diligence (CDD), suspicious transaction reporting, and emerging trends in money laundering and terrorist financing. Training sessions may be conducted through various formats, such as in-person workshops, online courses, webinars, or a combination of these methods.

The training plan incorporates both initial training for new hires and ongoing training for existing employees. Initial training equips new employees with the foundational understanding of AML requirements specific to their roles. Ongoing training ensures that all staff members stay up-to-date with evolving regulatory standards, emerging risks, and industry best practices. The frequency of training sessions is determined based on the nature of employees' roles, regulatory requirements, and changes in the AML landscape.

- Succession Plan:

Our AML Policy includes a robust succession plan to ensure business continuity and the smooth transition of key personnel. This plan identifies critical roles within the AML function and establishes guidelines for identifying, developing, and preparing suitable successors for these positions. Succession planning enables us to mitigate the risks associated with the loss or unavailability of key AML personnel and ensures a seamless continuation of AML operations.

Additionally, the succession plan extends to new staff, providing a structured framework for their onboarding and integration into the AML function. It includes mentorship programs, job shadowing opportunities, and knowledge transfer activities to facilitate their smooth transition into their roles.

- Responsible Party for Staff Training:

The responsibility for providing staff training lies with the Compliance Officer. He/she is accountable for the planning, development, coordination, and delivery of AML training initiatives. The Compliance Officer collaborates closely with subject matter experts, regulatory bodies, internal stakeholders, and external training providers to ensure that the training content remains relevant, up-to-date, and aligned with regulatory expectations.

The Compliance Officer is also responsible for tracking and documenting employees' participation in training sessions, maintaining training records, and conducting periodic assessments to measure the effectiveness of the training program. He/she actively seeks

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feedback from employees, monitor regulatory changes, and continuously enhances the training materials and delivery methods to promote a robust learning experience.

By incorporating this detailed staff training plan, including succession planning and clearly defining the responsible party for training, we demonstrate our commitment to fostering a well-informed, competent, and adaptable workforce that effectively contributes to our AML compliance efforts.

6. CONCLUSION

Money laundering and terrorist financing present a severe threat to the society and to the reliability of the international financial system. Battling these threats requires a coordinated and co-operative approach. Facilitating a financial transaction while willingly or recklessly disregarding the source of a customer's funds or the nature of a customer's transaction can give rise to criminal and/or civil liability for the employee and/or the Company. Z Trading & Technology Inc. is committed to support the fight of BVI authorities, against Money laundering and Financing of Terrorism.

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