

Anti-Money Laundering and Counter-Financing of Terrorism Policy

Customer Due Diligence, monitoring, sanctions screening and Suspicious Transaction Reporting framework.

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1. Issuing Entity

This document is issued by Infinity Union Markets Ltd. (Company Registration No. LL18105), holder of Money Broker License No. MB25/0135 issued by the Labuan Financial Services Authority ("Labuan FSA") under the Labuan Financial Services and Securities Act 2010 (LFSSA), Part VI – Money Broking.

Registered office: Unit Level 12F(1), Main Office Tower, Jalan Merdeka, Financial Park Labuan, 87000 Federal Territory of Labuan, Malaysia

Operating office: Office Suite 1359, Level 13(C), Block 4, Financial Park Complex Labuan, Jalan Merdeka, 87000 Labuan, Federal Territory of Labuan, Malaysia

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2. Regulatory Framework

Infinity Union Markets Ltd. maintains an Anti-Money Laundering ("AML") and Counter-Financing of Terrorism ("CFT") programme aligned with:

- The Anti-Money Laundering, Anti-Terrorism Financing and Proceeds of Unlawful Activities Act 2001 (AMLA) of Malaysia.
- Bank Negara Malaysia ('BNM') Policy Document on AML/CFT and Targeted Financial Sanctions for Reporting Institutions.
- Labuan FSA Guidelines on AML/CFT and Targeted Financial Sanctions for Labuan Key Reporting Institutions.
- Financial Action Task Force ('FATF') Recommendations.
- Applicable United Nations, OFAC, EU and UK sanctions lists.

3. Customer Due Diligence (CDD)

Before establishing a business relationship, we verify the identity of each prospective client using independent, reliable source documents and data, including (without limitation) government-issued identification, proof of residential address dated within the last three (3) months, and information on the source of funds.

Legal entity clients are subject to enhanced documentation requirements including certificate of incorporation, register of directors and shareholders, beneficial ownership disclosure for any owner of 10% or more, and resolutions authorising the account.

4. Enhanced Due Diligence (EDD)

Enhanced Due Diligence is performed where the risk profile so requires, including but not limited to: Politically Exposed Persons ('PEPs') and their close associates and family members; clients from FATF grey-listed or

higher-risk jurisdictions; clients with complex ownership structures; and clients funding accounts from third-party sources.

5. Sanctions and PEP Screening

All new and existing clients, their beneficial owners and authorised representatives are screened against UN, OFAC, EU, UK and Malaysian Ministry of Home Affairs sanctions lists, as well as global PEP databases, both at onboarding and on an ongoing basis using automated screening tools.

6. Ongoing Monitoring

Client transactions are monitored on a continuous basis using rule-based and behavioural surveillance. Unusual patterns, transactions inconsistent with the client's profile, or activity in higher-risk jurisdictions are escalated to the Money Laundering Reporting Officer ('MLRO') for review.

7. Suspicious Transaction Reporting

Where any director, officer or employee forms a suspicion that a transaction may be connected with money laundering, terrorism financing or other criminal conduct, an internal Suspicious Transaction Report is filed with the MLRO without delay. Reportable suspicions are escalated to the Financial Intelligence and Enforcement Department of Bank Negara Malaysia ('BNM UPW') in accordance with AMLA.

Tipping-off any client or third party that a Suspicious Transaction Report has been filed is a criminal offence under Malaysian law and is strictly prohibited.

8. Record-Keeping

Client identification records, transaction records, internal investigation files and correspondence with regulators are retained for at least six (6) years from the end of the business relationship or the date of the transaction, whichever is later.

9. Governance and Training

The Board of Directors approves the AML/CFT programme. A dedicated Compliance Officer and MLRO are appointed in accordance with Labuan FSA fit-and-proper requirements. All employees receive AML/CFT training at induction and at least annually thereafter, with specialised training for client-facing and compliance staff.

10. Independent Audit

The AML/CFT programme is subject to independent review at the frequency required by the Labuan FSA Circular on Compliance and AML/CFT Audit Reports Submissions. Findings and remediation actions are reported to the Board and to Labuan FSA as required.

Acknowledgement

By opening, maintaining or operating an account with Infinity Union Markets Ltd. you acknowledge that you have read, understood and accepted this document in its entirety.