



AML POLICY

This Anti-Money Laundering Policy (AML Policy) is prepared and issued by Dynamix Ltd, operating the brand name BXB Market, (hereinafter referred to as the Company/ BXB Market) in compliance with the relevant legal anti-money laundering and terrorist financing regulations.

With the Anti-Money Laundering Policy, the Company aims to outline the applicable procedures and measures for the detection, prevention, and dissemination of information about money laundering activities.

The applicable Anti Money Laundering framework targets criminal activities, including market manipulation, trade in illegal goods, human trafficking, corruption of public funds, and tax evasion, as well as the methods used to conceal these crimes, and the source of the money derived from them.

This Policy also outlines the procedures for preventing, detecting, reporting suspicious activities, as well as the training provided to responsible officers and personnel. These procedures and controls are developed using a risk-based approach, considering the money laundering and terrorist financing risks linked to each potential client or business relationship. In line with this, it further outlines the applicable Know Your Client (KYC) protocols for identifying and verifying a client's identity when opening an account and for conducting required periodic updates thereafter.

This AML Policy is subject to changes to ensure compliance with the applicable legal framework.

Definitions and Interpretation:

“Money Laundering”: the process of concealing or disguising the existence, source, movement, destination, or illegal application of illicitly derived funds or property for the purposes of making those funds appear legitimate.

“Anti-Money Laundering (AML)”: procedures, regulations, and laws for the prevention of attempts to disguise illegally obtained funds. A money laundering offense may be committed



by any individual who, knowing that a monetary instrument or property represents, involves, or is connected to, the proceeds of any unlawful activity, engages or attempts to engage said monetary instruments or property in a transaction. A money laundering offense may also be committed when person with the knowledge that any monetary instrument or property involves the proceeds of any unlawful activity, performs or omits to perform any act and, as a result, facilitates the offense of money laundering as described above. Additionally, the money laundering offense is committed by any person knowing that any monetary instrument or property is required under the applicable framework to be disclosed and filed with the MISA Department of Anti-Money Laundering (DAML) but failing to comply with the requirement.

“Covered Transaction” : a single, series, or combination of transactions involving a total amount in excess of ten thousand USD (USD 10,000.00) or an equivalent amount in foreign currency based on the prevailing exchange rate within five (5) consecutive banking days except those between a covered institution and a person who, at the time of the transaction was a properly identified clients and the amount is commensurate with the business of financial capacity of the client, or those with an underlying legal or trade obligation, purpose, origin or economic justification.

“Unlawful Activity”: any act omission or series or combination thereof involving or having relation to the following:

- a) Kidnapping, Terrorism and Hijacking
- b) Drugs selling, dealing and distributing
- c) Corrupt Practices and Corruption
- d) Plunder, Robbery and extortion
- e) Illegal gambling
- f) Piracy on the road, sea, and ocean
- g) Qualified theft
- h) Swindling, financial scams and fraudulent practices
- i) Smuggling
- j) Any other criminal activities



1. The Anti-Money Laundering Procedures:

BXB Market actively prevents any activity that promotes money laundering. These Provisions require the Company's management and staff to follow specific standards designed to prevent the use of its products and services for money laundering, in accordance with the applicable framework as amended from time to time.

Money laundering involves actions intended to conceal or mask the criminal origin of the income and exchange for money or other assets that are 'clean'. As part of its anti-money laundering procedures, the Company requires customers to provide documentation verifying their identity and the source of funds credited to their trading account opened with the Company for the purpose of investing in specific products and services. BXB Market takes all reasonable precautions aiming to ensure that the trading accounts open are not used for the purpose of holding assets obtained as the result of or for facilitating the commission of any criminal activity or for any purpose contrary to applicable laws and regulations.

In this respect, we maintain and apply in-practice procedures to identify and avoid any potential money laundering transactions and to ensure compliance with the requirements of the applicable legal framework. Among others the Company ensures that its staff is sufficiently trained and aware of anti-money laundering.

BXB Market is vigilant in ensuring the prevention of their involvement or misuse in money laundering activities and does not knowingly accept assets or enter business relationships where there is reasonable cause to believe that such assets may have been acquired illegally or that they represent the proceeds of criminal activity.

Before opening or maintaining any trading account, the Company verifies the identity of all clients. No trading account is opened or maintained unless this requirement is satisfied. In line with this, the Company established procedures to obtain appropriate proof of client identity and maintains adequate records in accordance with applicable regulations.



The ultimate responsibility for the effectiveness of the Company's AML/CFT framework lies with the board of directors while the senior manager is responsible for the development of robust risk management programs and ensures that the Board is adequately informed about these programs and their effectiveness.

We periodically review our policies and procedures to ensure consistency with the business model, and products and services available.

The Company acknowledges the importance of technology in the anti-money laundering landscape and aims to provide attention to the integration of new and developing technologies in this respect.

2. Client Due Diligence:

The Company implements a Client Due Diligence ("CDD") process for all new and prospective clients to collect the necessary information/documentation to identify and mitigate risks of money laundering, financing terrorism, and other illicit activities. CDD is conducted both prior to and during the establishment of a business relationship. Before accepting a new client, the Company performs KYC and due diligence procedures, which include examining factors such as our clients' identity and background, public or high-profile position (i.e. PEPs), linked accounts, business activities (current and past), and other risk indicators.

BXB Market may apply enhanced due diligence (EDD) where is justified by the associated risk or parameters set (for high-risk clients or transactions or business relationships).

BXB Market collects documents and regularly updates information in relation to the client's identity, address, source of funds, occupation, and expected business or transactional activity accompanied by documents verifying this information. Information collected will be verified by the collection of identification documentation, and via independent and reliable sources to confirm the veracity of the identifying information obtained.

Without limiting any provisions above, when establishing a business relationship, the Company may obtain information regarding the purpose and nature of the business relationship, as well



as details on the source of funds, source of wealth (where applicable), the client's identity (name, address, contact information). The Company also maintains appropriate risk management systems to determine whether a potential client, or beneficial owner is, may be, is found to be or becomes a Politically Exposed Person ("PEP"). In this context, the Company applies due diligence measures on a risk-sensitive basis.

In line with the above, the BXB Market applies reasonable measures to verify and adequately document the identity of the client or account holder at the outset of a business relationship.

CDD must be regularly renewed to ensure it remains up to date.

3. Client Identification of Physical and Legal Persons:

BXB Market verifies the true identity of all its clients (physical persons and legal persons). In the case of corporate clients, the Company verifies their legal existence, obtains information on their organizational structure, and confirms the authority and identity of all persons purporting to act on their behalf. The Company does not open or/and maintain anonymous trading accounts or/and accounts held under fictitious names. Below is a non-exhaustive list of the relevant documentation/information that the Company will request to establish and verify the true identity of its clients:

Physical Persons	Legal Persons
Full name	Name of the corporate entity, identifier, or registration number;
Date of birth	Principal place of business and registered office;
An up-to-date ID/Passport number and nationality	Contact telephone numbers;
Genuine photograph depicted in an official document such as a passport, national ID card or driver's license	Information/Documentation on the beneficial owner;

Residential address of the client (corroborated by a valid utility bill, telephone bill or bank statement)	In case of involvement, the identity of the beneficial owner (full name, a photograph of official documents, residential address, and the relationship between the beneficial owner and client)
Confirmation of the business relationships with the client (purpose of the planned transactions and the source of funds)	Name of the corporate entity, identifier, or registration number;
Confirmation of whether the client is included in PEP lists, sanctions and/or other watchlists	A certified copy of the Certificate of Incorporation;
The Company may collect additional documents or request the completion of further verification procedures in order to satisfy its obligations, including those relating to the source of wealth and source of funds (e.g. bank statements, tax returns, or pay slips).	Satisfactory evidence of the identity of all account signatories, details of their relationship with the company and if they are not employees, an explanation of the relationship. All signatories must be verified in accordance with the identification and verification of identity requirements of natural persons;
	Identity information on the natural persons with significant control of the corporate entity. However, if the company is publicly listed on a recognized stock exchange and not subject to effective control by a small group of individuals, identification and verification of the identity of shareholders is not required;
	Confirmation before a business relationship is established, by way of company search and/or other commercial enquiries that the applicant company has not been, or is not in

	the process of being dissolved, struck off the company's register, wound-up or terminated;
	Description and nature of business;
	Purpose of the account and source of funds;
	By-laws and any other relevant corporate documents filed with the Companies' Registry;
	Satisfactory evidence of identity must be established for at least two directors, one of whom should, if applicable, be an executive director where different from account signatories; and
	Such other official documentary and other information as is reasonably capable of establishing the structural information of the corporate entity.

** It is at the Company's discretion to request additional information accompanied by the relevant documentation.*

It is noted that the Company keeps appropriate records regarding the true identity of its clients based on official documents provided and collected from independent sources.

4. Risk Assessment:

The Company follows a risk-based approach (RBA) to ensure that its measures for preventing and mitigating money laundering and terrorist financing are proportionate to the level of risks identified. This approach encompasses client acceptance and ongoing monitoring policies and



procedures, aimed at identifying clients who may present higher risk of involvement in money laundering and terrorist financing.

In line with the applicable framework, the Company adopts reasonable criteria to assess risks and conducts periodic reviews to determine if any adjustments to client risk ratings or internal controls are necessary.

5. Record Keeping:

BXB Market maintains records of client transactions, which are securely stored for five (5) years from the date of each transaction. In the case of closed accounts, records related to client identification, account files, and business correspondence are preserved and securely stored for at least five (5) years from the date the relevant business or transaction is completed, or from the termination of the business relationship. The Company ensures that all client information and transaction records are readily available to authorities upon request.

6. Suspicious or Covered Transactions:

The Company will promptly report any suspicious or covered transactions related to clients' trading accounts within the timeframe specified by applicable laws or the Supervising Authority. Special attention will be given to complex, unusual, or large transactions, as well as to unusual transaction patterns, or small but recurring transactions that appear to lack an apparent economic or lawful purpose.

The Company will establish and maintain procedures to monitor client and account activity, focusing on effectively identifying indicators such as transaction patterns, sources of funds and wealth, and geographical risks. This will be accomplished in line with FATF recommendations and international standards for combating money laundering, terrorism financing, and proliferation financing.