

X GLOBAL Markets Ltd AML Policy

X GLOBAL Markets Ltd collects and verifies the personal identification information of all account holders, and then subsequently logs and tracks the transactions that are carried out by its clients. In order to open an account with X GLOBAL Markets Ltd, a valid form of government-issued identification (Passport, State ID, or Driver's License), a proof of residence, and bank account information is required, along with a completed account application.

It should be noted that X GLOBAL Markets Ltd tracks any suspicious transactions made by clients and any transactions executed under non-standard trading conditions.

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- X GLOBAL Markets Ltd carries out its activities in line with the anti-money laundering framework as laid out by the Financial Action Task Force.
 - All X GLOBAL Markets Ltd client funds are held in separate, segregated accounts that are designated solely for client deposits and withdrawals.
 - X GLOBAL Markets Ltd monitors funding from bank accounts held outside the account holder's home country.
 - X GLOBAL Markets Ltd does not accept deposits from third-parties nor cash deposits or disbursements under any circumstances.
 - X GLOBAL Markets Ltd matches each deposit to the account name held on file for that customer.
 - X GLOBAL Markets Ltd reserves the right to refuse to process a transaction where it believes the transaction to be connected in any way to money laundering or criminal activity. In accordance with international law, X GLOBAL Markets Ltd is under no obligation to inform the client when suspicious activity is reported to any corresponding regulatory or legal bodies.

Account Opening Procedures - Know Your Customer Policy (KYC)

As part of the account opening procedure, prospective customers must provide proof of identity and address, source of funds and investment objectives to X GLOBAL Markets Ltd.

X GLOBAL Markets Ltd is operating under Directive 2004/39/EC of the European Parliament and of the Council of 21 April 2004 on markets in financial instruments amending Council Directives 85/611/EEC and 93/6/EEC and Directive 2000/12/EC of the European Parliament and of the Council and repealing Council Directive 93/22/EEC, as the same may be in force from time to time and modified or amended from time to time (the "Markets in Financial Instruments Directive (2004/39/EC)" or "MiFID")

The “Financial Action Task Force” (FATF) sets AML policies for countries to follow. X GLOBAL Markets Ltd is required to do an “Enhanced Due Diligence” on clients from the others as they are classed as High Risk by the FATF, thus, we cannot accept clients from *The United States, North Korea, Iran, Myanmar, Cuba, Sudan, Syria and British Columbia in Canada including US citizens residing outside the US.*

Account Opening Requirements:

“X GLOBAL Markets Ltd is committed to the prevention of money laundering activities through our services and as such comply with regulatory requirements such as:

- Identifying our clients;
- Identifying, monitoring and reporting any kind of suspicious transactions;
- Maintaining transaction records for minimum 5 years after the termination of our contractual relationships with our clients;
- Training our staff to recognize suspicious transactions and to fulfil all reporting obligations;
- Depending on client location, report any suspicious activities to authorities in several countries.”

Photo ID - The following are acceptable forms of photo identification:

- A valid passport
- A valid National Identity Card
- A valid government ID, such as a Driver's License or State ID

(Please note that all photo IDs are verified through third-party compliance software.)

Proof of Residence - The following are acceptable forms of proof of residence:

- A utility or phone bill
- A bank statement

(Please note that proof of residence must be current i.e. not older than 90 days)

Bank Account Requirements

- X GLOBAL Markets Ltd account holders must have a valid bank or credit card account in their name. The bank/credit card statement must show their name and the same registered address as that shown on their application.
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Funds Withdrawal Procedure

The withdrawal procedure at X GLOBAL Markets Ltd detailed below follows the strict principle that ensures funds are securely remitted back to their originating source.

- X GLOBAL Markets Ltd customers must complete a signed paper or digital withdrawal request containing inter alia, their correct account information.
 - The withdrawal form must be submitted to the X GLOBAL Markets Ltd Back-office department for processing. The Back-office department will confirm the account balance, verify that there are no holds or withdrawal restrictions on the account, and then approve the withdrawal request, pending compliance approval.
 - The X GLOBAL Markets Ltd Internal Reporting and Matching department reviews all withdrawal requests approved by the Back-office department, verifying that the original funds are being withdrawn through the same method of deposit and to the name of the account holder on file.
 - The Compliance department will also examine the withdrawal request against the customer's deposit history to ensure there is no suspicious activity, and if none verifies the bank account details held on file.
 - Withdrawal requests approved by the X GLOBAL Markets Ltd Compliance department are sent back to the Internal Reporting and Matching department, and the funds are released to the client.
 - In the event that a withdrawal is flagged for suspicious activity, the withdrawal is placed on hold, pending further investigation by X GLOBAL Markets Ltd management.
 - X GLOBAL Markets Ltd Management will decide if further action is needed and which, if any, relevant regulatory bodies need to be contacted.
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Compliance Footnote

The compliance procedure related to AML listed above is only a brief summary of the compliance function guidelines followed by the X GLOBAL Markets Ltd compliance team. A detailed copy of our compliance policy is available for qualified institutions, regulatory bodies, and related counterparties. For additional questions concerning X GLOBAL Markets Ltd policies, please contact our Compliance department. No substitutions or modifications will be accepted

to the requirements above. The X GLOBAL Markets Ltd Compliance department reserves the final determination regarding the validity of these documents.

Clients should assume that all information provided to the Company is available to the competent regulatory authorities in (a) the country of incorporation of the Company, i.e. the Republic of Cyprus; (b) the country of origin of any funds transmitted to X GLOBAL Markets Ltd; and (c) the destination country of any funds refunded by or withdrawn from the Company.

X GLOBAL Markets Ltd does not want your business if your funds are sourced from criminal activities or if the nature of your account transactions is illegal in any manner whatsoever.

The Company reserves the right to review and/or amend its Money Laundering Prevention Policy, at its sole discretion, whenever it deems fit or appropriate.

Our AML Policy is a policy only, it is not part of our Terms and Conditions of Business and is not intended to be contractually binding.