

## **AML & KYC POLICY**

### **1. Introduction**

Nexify Capital Limited (hereinafter referred to as the “Company”) is a Seychelles Investment Firm incorporated under the laws of the Republic of Seychelles with Registration No. 8437730-5 and regulated by the Financial Services Authority of Seychelles (“FSA”) under License Number SD129.

The Company is fully committed to complying with all applicable laws, regulations, and regulatory guidance relating to Anti-Money Laundering (“AML”) and Counter-Terrorism Financing (“CTF”), including but not limited to the relevant legislation, rules, directives, and guidelines issued by the FSA and other competent authorities.

This AML & KYC Policy sets out the principles, controls, and procedures adopted by the Company to prevent, detect, and report money laundering, terrorist financing, and other financial crimes.

### **2. Regulatory Framework and Compliance**

The Company operates in strict compliance with:

- Applicable AML and CTF laws and regulations of Seychelles;
- FSA rules, directives, and guidance notes;
- International standards and best practices, including FATF recommendations, where applicable.

The Company maintains internal policies, procedures, systems, and controls designed to ensure continuous compliance with these obligations and to mitigate the risk of financial crime.

### **3. Client Due Diligence (CDD) and Know Your Customer (KYC)**

The Company applies a risk-based approach to customer due diligence and performs KYC checks prior to establishing a business relationship and on an ongoing basis throughout the duration of the relationship.

The Company is committed to:

#### **3.1 Identification and Verification of Clients**

The Company requires all clients to provide accurate, complete, and up-to-date information, including but not limited to:



- Full legal name;
- Residential address;
- Date and place of birth;
- National identification card, passport, social security document, or another valid government-issued identification document.

The Company reserves the right to request additional documents or information at any time to satisfy its regulatory obligations.

### 3.2 Purpose and Nature of Business Relationship

When establishing a client relationship, the Company gathers information regarding:

- The purpose of the account;
- The expected nature of the business relationship;
- The anticipated level of activity and source of funds.

## 4. Beneficial Ownership

The Company identifies and verifies the beneficial owner(s) of all client accounts and will not open or maintain an account unless this requirement is fully satisfied.

For legal entities, the Company takes reasonable measures to identify and verify:

- The entity's legal name, legal form, registration number, and registered address;
- Directors, authorized signatories, and controlling persons;
- Ultimate beneficial owners and ownership/control structure;
- Authority granted to individuals acting on behalf of the entity.

## 5. Politically Exposed Persons (PEPs)

The Company maintains appropriate systems and controls to determine whether a client or beneficial owner is a Politically Exposed Person (PEP).

Where a client or beneficial owner is identified as a PEP, the Company shall:

- Apply enhanced due diligence measures;
- Obtain senior management approval prior to establishing or continuing the relationship;
- Take reasonable steps to establish the source of funds and source of wealth;



- Conduct enhanced and ongoing monitoring of the business relationship.

## **6. Ongoing Monitoring**

The Company continuously monitors client transactions and business relationships to ensure that activities are consistent with the Company's knowledge of the client, their risk profile, and source of funds.

Ongoing monitoring includes:

- Reviewing transactions for unusual or suspicious patterns;
- Updating client information and documentation as required;
- Applying enhanced monitoring for higher-risk clients.

## **7. Prohibited Activities and Transactions**

The Company strictly prohibits:

- Acceptance of cash deposits;
- Cash-related payment methods;
- Transactions involving cryptocurrencies or virtual assets;
- Business relationships where there is reasonable suspicion of illegal activity or proceeds of crime.

The Company does not knowingly accept assets derived from illegal or criminal activities.

## **8. Suspicious Activity Reporting**

The Company exercises the highest level of vigilance to detect and prevent money laundering and terrorist financing.

Where there is suspicion that:

- Funds are derived from criminal activity;
- A client is involved in money laundering or terrorist financing;
- Transactions are inconsistent with the client's profile;

the Company shall follow established internal procedures to assess the matter and promptly report suspicious transactions to the relevant Supervisory Authority, in accordance with applicable laws and regulations.

## **9. Record Keeping**

The Company maintains accurate and complete records of:



- Client identification and verification documents;
- Transaction records;
- Internal and external reports of suspicious activity.

All records are retained for the period required by applicable laws and regulations and in a manner that enables timely access for regulatory or law enforcement purposes.

## **10. Data Protection and Confidentiality**

The Company ensures that all personal data collected for AML and KYC purposes is handled with strict confidentiality and processed in accordance with applicable data protection laws.

Client information is used solely for regulatory compliance, risk management, and legitimate business purposes and is disclosed only where required or permitted by law.

## **11. Employee Responsibility and Training**

The Company ensures that its employees:

- Are adequately trained in AML and CTF obligations;
- Understand how to identify and report suspicious activity;
- Comply with internal policies and procedures at all times.

## **12. Amendments and Updates**

This AML & KYC Policy may be amended from time to time to reflect changes in laws, regulations, or regulatory expectations. Updated versions will be made available on the Company's website where appropriate.

## **13. Contact Information**

If you have any questions or require further information regarding this AML & KYC Policy, please contact the Company through the official communication channels provided on the website.