

## Giraffe Markets Limited AntiMoney Laundering Policy

### 1. Introduction

Giraffe Markets Limited is committed to preventing money laundering and the financing of terrorism through its forex brokerageservices. ThisAnti Money Laundering (AML) Policy is designed to outline the framework, procedures, and responsibilities for AML compliance within our organization.

### 2. Regulatory Compliance

Giraffe Markets Limited is fully committed to complying with all relevant national and international AML laws and regulations, including but not limited to:

- The Financial Action Task Force (FATF)Recommendations.
- Local regulatory authorities.

### 3. Risk Assessment

We will regularlyconduct a risk assessment to identify and evaluatethe specific money laundering and terrorist financing risks that our businessfaces. This assessment will guide our AMLefforts and determinethe level of due diligencerequired for our clients.

### 4. Customer Due Diligence (CDD)

Giraffe Markets Limited will perform customerdue diligence on all clients. This includes:

- Verifying the identity and background of clients.
- Identifying the beneficial owners of corporateclients.
- Assessing the purpose and intended nature of the businessrelationship.

## 5. Ongoing Monitoring

We will maintain ongoing monitoring of client transactions to detect and report any suspicious activity. This includes monitoring for unusual patterns, high-value transactions, or sudden changes in client behavior.

## 6. Reporting Suspicious Activity

If any staff member suspects or has reason to believe that a client is involved in money laundering or terrorist financing, they are obligated to report it immediately to our appointed AML Compliance Officer.

## 7. Training and Awareness

Giraffe Markets Limited will provide regular AML training and awareness programs for all employees to ensure that they are informed about AML regulations and their responsibilities in preventing money laundering.

## 8. Record Keeping

All AML-related documentation and records will be retained for the prescribed period as required by law, and they will be readily available for regulatory authorities when requested.

## 9. Sanctions Screening

Giraffe Markets Limited will screen all clients and transactions against relevant sanctions lists to ensure compliance with international sanctions regulations.

## 10. AML Compliance Officer

We will appoint an AML Compliance Officer responsible for implementing and overseeing this policy, as well as liaising with regulatory authorities on AML matters.

## 11. Internal Reporting and Whistleblowing

We will establish internal reporting mechanisms to allow employees to report any potential AML violations without fear of retaliation.

## 12. Penalties for Non-Compliance

Failure to comply with this AML Policy will result in disciplinary action, including termination of employment if necessary, and may result in legal penalties.

## 13. Review and Update

This AML Policy will be reviewed and updated at least annually, or as necessary to ensure it remains current with changes in AML laws and regulations.

## 14. Conclusion

Giraffe Markets Limited is dedicated to maintaining the highest standards of AML compliance. This policy is a fundamental component of our commitment to preventing money laundering and the financing of terrorism.