

**JM GO
ANTI-MONEY LAUNDERING
POLICY**

1. INTRODUCTION

Just Global Markets (MU) Limited, registration number 194590 GBC, address: The Cyberati Lounge, C/o Credentia International Management Ltd, Ground Floor, The Catalyst, Silicon Avenue, 40 Cybercity, 72201 Ebène, Republic of Mauritius, an Investment Dealer (Full Service Dealer, Excluding Underwriting) regulated by the Financial Services Commission (FSC) in Mauritius under a License number GB22200881 (hereinafter referred to as the "the Company" or "JM GO") is committed to maintaining the highest standards of compliance with Anti-Money Laundering (AML) and Counter-Terrorism Financing (CTF) regulations. The purpose of this AML Policy is to prevent the use of JM GO's services for money laundering, terrorist financing, fraud, or other financial crimes.

This policy applies to all JM GO employees, clients, contractors, and stakeholders. Compliance with AML regulations is a key priority to ensure the integrity of financial markets and protect our business and clients from illicit activities.

2. DEFINITION OF MONEY LAUNDERING

Money laundering is the process of disguising illegally obtained funds as legitimate financial assets. It typically occurs in three stages:

- Placement – Illegally obtained funds are introduced into the financial system (e.g., deposits, purchases of financial instruments, or high-value assets).
- Layering – Funds are transferred or converted to obscure their origin.
- Integration – Laundered funds are reintroduced into the economy, appearing as legally acquired assets.

JM GO strictly prohibits any involvement in money laundering activities and implements comprehensive monitoring and reporting measures to detect and prevent such activities.

3. AML COMPLIANCE MEASURES

To ensure compliance with AML laws, JM GO implements the following measures:

3.1. Know Your Customer (KYC) and Customer Due Diligence (CDD)

JM GO verifies the identity of all clients before establishing a business relationship. The following information is collected and assessed:

- Full name, date of birth, nationality, and contact details
- Official identification documents (e.g., passport, national ID, driver's license)
- Proof of residence (e.g., utility bills, bank statements)
- Source of funds and expected transaction behavior
- For corporate clients: Certificate of Incorporation, Memorandum and Articles of Association, list of directors, and proof of business operations Enhanced Due Diligence (EDD) is applied to high-risk clients, including politically exposed persons (PEPs) and clients from jurisdictions with weak AML controls.

3.2. Ongoing Monitoring of Transactions

JM GO continuously monitors client transactions to detect suspicious activities, including:

- Large or unusual transactions inconsistent with a client's profile
- Rapid movement of funds between multiple accounts
- Deposits or withdrawals from high-risk jurisdictions
- Structuring transactions to avoid reporting thresholds
- Use of third-party accounts for transactions
- Transactions involving digital assets with unclear origins

Suspicious transactions are flagged and investigated in accordance with regulatory requirements. JM GO reserves the right to suspend accounts or transactions pending further investigation.

3.3. Record Keeping

JM GO retains client identification records, transaction history, and communications for a minimum of seven (7) years to ensure compliance with AML regulations. These records may be provided to regulatory authorities upon request. Records include:

- Customer identity verification documents
- All transaction records
- Correspondence related to customer activities
- Any suspicious activity reports filed.

3.4. Reporting of Suspicious Activities

JM GO promptly reports any suspected money laundering or terrorist financing activities to relevant regulatory and law enforcement authorities. Employees are trained to recognize red flags and report concerns to the company's AML Compliance Officer.

Indicators of suspicious activity include, but are not limited to:

- Transactions that do not match a client's financial profile
- Reluctance to provide requested identity verification documents
- Frequent transfers to offshore accounts
- Deposits followed by immediate withdrawals with no apparent business rationale
- Large cash deposits or payments from unknown sources

JM GO fully cooperates with financial regulators and law enforcement agencies in AML-related investigations.

3.5. Training and Awareness

All JM GO employees receive regular AML training to ensure they understand their responsibilities in detecting and preventing financial crimes. The training covers:

- AML laws and regulations
- Recognizing suspicious activities
- Proper client due diligence procedures
- Internal reporting protocols
- Consequences of non-compliance

Annual refresher training sessions are mandatory for all staff members involved in compliance, customer service, and financial transactions.

3.6. Enhanced Due Diligence (EDD) Procedures

For higher-risk clients, JM GO implements additional verification measures, such as:

- Requiring additional identity and financial documents
- Conducting deeper background checks
- Verifying the source of funds through official documents
- Monitoring all transactions more closely
- Implementing stricter transaction limits

EDD is especially applied to PEPs, high-net-worth individuals, and customers from countries with known AML deficiencies.

4. ADDITIONAL PROVISIONS

If a customer fails or refuses to provide the required verification data and supporting documents within a reasonable timeframe during the business relationship, JM GO reserves the right to terminate the relationship and close all associated accounts.

Both individual and corporate clients must promptly update their customer due diligence (CDD) information in the event of any changes, including but not limited to:

- Residential or business address updates
- Renewal or replacement of identification documents (e.g., new passport, ID card)
- Changes in business structure, ownership, or operations
- Addition of new business securities, ventures, or financial activities

For any changes occurring before the scheduled periodic review, clients must submit supporting documentation or an official letter verifying the modification.

5. PROHIBITED ACTIVITIES

JM GO strictly prohibits the following activities:

- Anonymous or third-party transactions without proper verification
- Accepting funds from unknown or unverified sources
- Processing transactions involving high-risk countries or entities sanctioned by international authorities
- Any attempt to circumvent AML compliance measures
- Use of JM GO's services for fraud, tax evasion, or illicit financial activities.

6. FUND DEPOSIT AND WITHDRAWAL POLICY

To maintain compliance with Anti-Money Laundering (AML) regulations and ensure the integrity of client transactions, JM GO enforces the following requirements for deposits and withdrawals:

6.1. General Requirements

- Deposits and withdrawals must be made exclusively using payment methods registered in the client's name. Transactions involving third-party accounts are strictly prohibited.
- JM GO may request additional documentation to verify the ownership of the deposit/withdrawal method before processing any transactions.

6.2. Deposit Requirements

- When depositing funds via bank transfer or credit card, the name on the account or card must match the client's registered name.
- Deposits made through electronic payment systems must be from an account registered to the client.

6.3. Withdrawal Requirements

- Withdrawals must be made using the same account or method that was used for the deposit.
- If a client has made deposits through multiple payment methods, withdrawals will be processed proportionally based on the size of each deposit.
- If the deposit method is not available for withdrawals, funds may be transferred to a verified bank account or another approved method, subject to identity verification.
- Profits may be withdrawn to any account previously used for deposits, provided that the method allows withdrawals.

6.4. Prohibited Transactions

- JM GO strictly prohibits deposits or withdrawals to/from third-party accounts, including but not limited to, bank accounts, credit cards, or electronic wallets not belonging to the client.
- Any attempt to bypass these rules may result in account suspension, transaction rejection, or further verification requests.

JM GO reserves the right to amend these requirements, perform additional due diligence, and refuse any deposit or withdrawal that raises compliance concerns.

7. RECORD KEEPING

JM GO is committed to maintaining comprehensive records in compliance with Anti-Money Laundering (AML) regulations and Know Your Customer (KYC) requirements. All records, including documents for customer identification, transaction data, and other information

related to money laundering (ML) prevention, will be retained for the legally required period to ensure proper regulatory compliance.

7.1. Customer Identification Documents: All documents obtained during the account opening process, along with records of all transactions, especially customer identification records, will be retained for a minimum of seven (7) years from the date of the transaction.

Closed Accounts: For accounts that have been closed, records related to customer identification, account files, and business correspondence will be securely stored for at least seven (7) years from the date the account was closed.

7.2. All retained records will be stored securely and confidentially, in line with applicable data protection regulations, to ensure their integrity and prevent unauthorized access.

7.3. The Company will make all necessary records available to regulatory authorities upon request and will comply with all applicable legal and regulatory obligations related to record retention.

8. COMPLIANCE AND ENFORCEMENT

Failure to comply with this AML Policy may result in account suspension, termination of services, and legal action. JM GO reserves the right to refuse service to any client suspected of engaging in illicit financial activities.

The JM GO AML Compliance Officer is responsible for ensuring company-wide adherence to AML policies and reporting obligations. The officer also liaises with regulatory authorities to keep the company aligned with global AML standards.

For further inquiries, clients may contact our AML Compliance Team at compliance@jm-go.com.

Disclaimer: This document is for informational purposes only and does not constitute legal or financial advice. Clients are encouraged to seek professional guidance regarding their AML obligations.