



# Link Global Markets LLC

## Anti-Money Laundering Policy

This Anti-Money Laundering Policy is governed by and construed in accordance with the laws of SVG.

Link Global Markets LLC ("the Company," "we," or "our") is a limited liability company established under the Revised Laws of Saint Vincent and the Grenadines, Chapter 151, of 2009, known as the "Limited Liability Company Act.

This document is our Anti-Money Laundering Policy, collectively referred to herein as this "Anti-Money Laundering Policy" or "Terms of Service" in the following text.

This Anti-Money Laundering Policy constitutes a legally binding contract between you and us, so it is essential that you carefully read these Terms of Service. If there is anything in these Terms of Service that you do not understand, please seek independent professional advice.

Unless otherwise stated, for the purposes of these Terms of Service, references to "you" or "your" shall mean you.

## **1. General Terms**

Link Global Markets LLC (hereinafter referred to as "Company" or "LXFX") aims at maintaining high standards in AML (Anti-Money Laundering) and CFT (Combating the Financing of Terrorism) procedures.

The Company takes necessary measures to ensure that Clients, Investors, Agents, Intermediaries and other entities involved in business are not engaged in any form of illegal activities, including but not limited to money laundering, terrorist financing, proliferation of weapons of mass destruction, drug trafficking, blackmailing, smuggling, concealment of corruption schemes, tax evasion and cybercrime actions.

This policy offers general information to potential or existing Clients of the Company, outlining its general responsibilities towards Client verification and the steps taken to detect and prevent Money Laundering and Terrorist Financing.

Before registering a trading account on the platform, the Client acknowledges having read and agreed to the Company's AML/CFT policy and the List of Prohibited Jurisdictions.

## **2. Anti-Money Laundering Definition**

Anti-Money Laundering (AML) refers to procedures, regulations, and laws designed to reveal attempts to disguise illegally obtained funds. Hiding the source of funds from financial regulators or law enforcement entities may be considered a financial crime, leading to serious consequences.

The expansion of the financial industry prompted the implementation of AML regulations and laws due to the growing concerns around money laundering in our rapidly evolving society. These measures have been adopted globally, leading to organizations and individuals involved in such activities encountering challenges with official regulators and law enforcement agencies.

This Anti-Money Laundering Policy is governed by and construed in accordance with the laws of SVG.

### **3. The policy of Anti-Money Laundering and Combating the Financing of Terrorism adopted at Link Global Markets LLC.**

The Company fully complies with the laws and regulations of the Cook Islands that are aimed at preventing Money Laundering and Terrorist Financing. Detailed information regarding these laws and regulations can be found on the website of the Financial Supervisory Commission (FSA) of the Saint Vincent and the Grenadines.

Money Laundering and the Financing of Terrorism are considered criminal offenses in the Saint Vincent and the Grenadines.

In accordance with the Financial Transactions Reporting Act 2017 (FTRA), the Company has implemented the following Compliance Program for combating Money Laundering and Terrorist Financing:

#### **3.1 Development of the AML/Compliance Department**

The AML/Compliance Department oversees the Compliance Program within the Company.

The AML/Compliance Department is responsible for the following:

Developing, implementing, and updating internal AML policy that is in compliance with the FTRA.

Supervising and facilitating training for the staff on identifying suspicious financial patterns. Providing assistance to Financial Intelligence Units in the detection and prevention of suspicious financial activity.

Informing the Board of Directors and Senior Management about the Compliance Program and the Company's financial risks.

Conducting verification and monitoring of the Company's Clients (Customers).

The AML/Compliance Department is led by a Money Laundering Reporting Officer (MLRO) appointed by the Board of Directors.

#### **3.2 Mandatory Know Your Customer policy**

The Know Your Customer (hereinafter referred to as "KYC") is a mandatory procedure for verifying a Client's identity. It helps to protect the Client's and Company's interests by minimizing risk of fraudulent activities.

Opening fraudulent and anonymous trading accounts in financial institutions is strictly prohibited by applicable laws.

The KYC procedure includes, but is not limited to, verifying the Client's:

Document validity;

Personal Information;

This Anti-Money Laundering Policy is governed by and construed in accordance with the laws of SVG.

Email and Phone Number;  
Country of Residence.

The Company reserves the right to request additional information for completing the KYC procedure when deemed necessary. Submitting insufficient or incorrect data by a Client may lead to rejection or termination of services.

Client verification is performed with documents submitted electronically via the third-party service provider.

The confidential information collected by the Company can be disclosed to a third-party only if the request complies with applicable laws.

Any inquiries related to the KYC procedure can be sent to [compliance@lxfx.com](mailto:compliance@lxfx.com).

### **3.3 Automated Risk-Scoring System**

The Company uses an Automated Risk-Scoring System for detecting suspicious Clients and transactions when the risk of Money Laundering and Terrorist Financing appears to be higher.

The Company reserves the right to regulate this System when deemed necessary.

Customers' risk profiles are reviewed on a regular basis by the AML/Compliance Department.

Detailed information about the Risk-Scoring System and internal procedures of the Company is not disclosed publicly due to security reasons.

Based on the data collected, the AML/Compliance Department estimates the risks for the Company and takes the measures required.

### **3.4 Informing Employees about Anti-Money Laundering Regulations**

Anti-Money Laundering Policies apply not only to bad actors trying to launder illegally procured funds, but also to financial institution employees who take part in monitoring and processing transactions, if there is a possibility of any Money Laundering activity.

Employees of the Company are informed and instructed on a continuous basis about the AML regulations and suspicious patterns attributed to organizations or individuals wishing to launder illegally obtained funds.

Employees of the Company who have suspicions based on the AML instructions and this Policy inform their supervisor and the AML/Compliance Department for further investigation.

This Anti-Money Laundering Policy is governed by and construed in accordance with the laws of SVG.

### **3.5 Regulations on Politically Exposed Persons (PEPs)**

A Politically Exposed Person in the context of this Policy stands for a person stipulated by Article 3 of the FTRA and includes:

An individual, who has been entrusted with prominent public functions;  
Family members and close associates of this individual as specified by the FTRA.  
Clients who declare having the PEP status are obliged to provide copies of documents confirming such status to the AML/Compliance Department via the email address [compliance@lxfx.com](mailto:compliance@lxfx.com). These documents must be provided before registering a trading account on the platform.

Each case of doing business with a PEP is discussed in private between the parties involved, considering the applicable legislation.

The Company is obliged under the applicable law to be informed about Politically Exposed Persons using its services. The Company reserves the right to use the Third-Party services for confirming the PEP status and ask for additional information when deemed necessary.

### **4. Recordkeeping**

The Company keeps records in the English language in relation to identification, verification and financial operations of its Clients, including but not limited to:

Information provided by the Client for identity verification;  
Methods used for depositing/withdrawing the funds;  
Information about the Client obtained from third-party databases;  
Any discrepancies that arise during the Client's verification process.  
These records are retained for six years from the date of the Client's last financial activity or the closure of the Client's account. The Company keeps all records related to any suspicious Client activity for a period of six years.

Any questions or requests regarding the AML and CFT procedures of Link Global Markets LLC or this policy in general should be directed to [compliance@lxfx.com](mailto:compliance@lxfx.com).