



AML & KYC Policy

Effective from July 16, 2024, until further notice.

REGULATORY FRAMEWORK

The use of assets obtained unlawfully to hide their true nature or source is known as money laundering. Transferring illicit funds into the established financial system while evading detection is the aim of money laundering. It becomes challenging to track down the source of money when it is moved and transferred through a number of intricate transactions.

OBLIGACY TO DETERMINE AND AFFIRM CLIENT'S IDENTITY

Clients of Lindex Capital Ltd. fall into various categories, and each is recognized and validated. The clients' specific information is needed by the clients.

Records for verification

For every transaction, Lindex representatives have to finish the verification process. If a company is found guilty of a crime and does not get or does not validate the specific data specified in the "Know Your Client" checklists, it could face fines or even imprisonment.

For each client, Lindex requires two different documents to be submitted in order to verify their identity. An official government-issued identity document with a client photo on it is the first document we need. Passports issued by the government, driver's licences (in those countries where they are the primary form of identification), and government-issued ID cards are among the acceptable forms of identification.

We require a second document, a bill that was issued no more than three months ago and includes the client's entire name and current address. The client's name and address must be on the document, which must also be issued by a reputable company like a bank or utility company.

Clients must promptly furnish up-to-date identification and contact information whenever there are any changes. Lindex mandates that all deposits must originate from the client whose name matches the name recorded in our system. Third-party payments are not accepted. Concerning withdrawals, funds can be

retrieved from the same account and using the same method through which they were initially received. When initiating withdrawals, it is crucial that the recipient's name precisely matches the Client's name as recorded in our system. For deposits made via wire transfer, withdrawals can only be processed through a wire transfer to the identical bank and account.

If the deposit was made via electronic currency transfer, withdrawals can only be made through the same system and to the account from which it originated.

Ensuring the accuracy of the Client's information:

Regarding an ongoing business relationship, Lindex is required to take the necessary steps to guarantee the accuracy of any information that may change. Every transaction Lindex conducts with a client must follow the "Know your client" protocol. Employees who become aware of changes in the client's details should promptly acquire the new information.

Supplementary precautions when acting as a representative:

In addition to the standard procedures for identification and verification, Lindex needs to obtain specific data from people that attests to their authorization to act on behalf of a customer. This refers to a Mandate or Power of Attorney.

ADOPTING A RISK-BASED APPROACH

Specific details must be verified by Lindex Capital through comparison with information that can be obtained and verified in a reasonable and practical manner.

Only clients who pose a high risk are subject to this requirement, requiring a closer examination than clients with less risky profiles. Consequently, as the level of risk increases, the verification level should be heightened, and more robust verification methods should be employed to ensure greater security.

OBLIGATION TO PROVIDE EMPLOYEE TRAINING

To guarantee that all employees follow the law and internal policies, such as this AML & KYC Policy, Lindex will provide thorough training to all of its employees.

OBLIGATION TO PRESERVE DOCUMENTATION

The company identifies and validates clients, whether they are involved in a one-time transaction or a continuous business relationship.

Duration of Record

Retention:

- *Retention Period: After the business relationship has ended, the records must be kept up to date for at least five years.*
- *Reporting of Suspicious Transactions: Documentation of reported transactions needs to be kept on file for at least five years after the report date.*
- *Transaction: After a transaction is finalized, its supporting documentation must be kept on file for at least five years.*

It is crucial to keep comprehensive records for at least five years to facilitate the investigation and prosecution of any relevant criminal activities.

SUSPICIOUS AND UNUSUAL TRANSACTION REPORTING

The legislation mandates the disclosure of suspicious and irregular transactions. Reporting suspicious and unusual transactions is crucial to every country's anti-money laundering programme. If there are indications of suspicious activity that indicate potential money laundering, further investigation will be conducted before proceeding with the transaction. If a logical explanation cannot be ascertained, the suspicious activity must be reported in accordance with the Law by Lindex.