

Verification Process Policy

Xtrade International Ltd supports the fight for the prevention and suppression of the use of the financial system for the purpose of money laundering and terrorist financing. Xtrade follows the guidelines set by the Units for Combating Money Laundering Offences internationally and has adopted policies and procedures so as to comply with the Prevention and Suppression of Money Laundering Activities applicable laws on a cross-border basis, as amended and any directives of its supervisory authority International Financial Services Commission (IFSC).

Xtrade International Ltd has put in place systems and procedures according to the provision of the Law and the directive, with the purpose to make sure that its business is not used for the purposes of money laundering or terrorist financing, in relation to, but not limited to the following:

• customer identification and customer due diligence consisting of client's appropriateness test (personal questionnaire), collection of documents such as passports, IDs, utility bills etc.

• record-keeping of customer information and ongoing monitoring where additional information and/or documents may be requested from our clients;

• internal reporting of suspicious transactions to the internal anti-money launderingcompliance officer and reporting to relevant supervisory authority;

• internal control, risk assessment and risk management in order to prevent money laundering and terrorist financing;

• informing our employees in relation to the Law and the internal policies and antimoney laundering procedures of Xtrade;

• ongoing training of our employees in the recognition and handling of transactions and activities which may be related to money laundering or terrorist financing.

During the customer identification and due diligence checks Xtrade shall apply processes to verify your identity for which (amongst other things) Photo identification information will be required from you among other, as summarized above. In certain circumstances we may require this information to be authenticated by an appropriate third party.

In addition, Xtrade does not accept cash, money orders, third party transactions, exchange houses transfers or Western Union transfers or similar. Xtrade reserves the right to reject any deposits from accounts not belonging to the client or effect any withdrawals to third parties.