



AML, Due Diligence Policy



XBTFX is firmly dedicated to maintaining a secure, compliant, and trustworthy platform. We are fully devoted to the identification, prevention, and reporting of money laundering, terrorism financing, and other illicit activities in accordance with prevailing AML Laws, CTF Laws, Anti-Corruption Laws, and Economic Sanctions Laws. We uphold stringent user due diligence protocols and continuous analysis and reporting measures.

Upon accepting our Terms of Service, you are obligated to confirm your compliance with our strict regulatory standards. This entails verifying that you do not fall under the category of Prohibited Persons and that you are not engaging in any transactions involving fiat currencies, digital assets, or funds on behalf of a Prohibited Person. It is imperative that you promptly provide all the necessary information required to fulfill the due diligence obligations set forth by relevant laws, XBTFX's compliance policies, and the stipulations of our affiliated entities.

Furthermore, XBTFX may need to ascertain whether you intend to deposit, withdraw, or transfer Fiat or Digital Tokens to, from, or via a U.S. Financial Institution for the purpose of availing our Services. If so, you must provide all requested information essential for compliance with due diligence standards.

You are obligated to promptly supply any documents, information, or records requested by XBTFX at any time. This may include a self-certification to facilitate tax residence and status determination under Tax Information Exchange Laws. XBTFX will retain specific information, documents, and records as per the law and its contractual obligations.

We continuously monitor for suspicious or sanctionable transactions in line with AML, CTF, Anti-Corruption, and Economic Sanctions Laws, and report to FinCEN, OFAC, FIA, and international regulators. These measures apply even after the termination of your association with XBTFX or withdrawal of your funds. Our policy is universal and applies to all Digital Tokens, Fiat, and other properties exchanged via our site or involving our associates.

XBTFX holds the authority to prohibit or limit transactions, impose additional due diligence measures, suspend, or terminate the provision of services to any user at any given moment. The grounds for such actions may include, but are not limited to, clauses stated in our Terms of Service or any legal constraints mandated by relevant laws.

These measures apply, but are not limited to, instances where the user or the associated transaction involves:

Prohibited Person:



- I. A person or entity subject to sanctions (Sanctioned Person);
- II. A citizen, resident, government official or entity from a prohibited jurisdiction, or any person or entity operating under the jurisdiction of these areas (Prohibited Jurisdiction);
- III. A U.S. Person, or a person from Bulgaria, Belgium, or Quebec;
- IV. A person or entity from any jurisdiction that falls short of international AML-CFT standards, which include, but are not limited to, jurisdictions identified by the Financial Action Task Force (FATF) as high-risk, non-cooperative, or strategically deficient (including North Korea, Iran, Russia, Botswana, Cambodia, Ethiopia, Ghana, Pakistan, Serbia, Sri Lanka, Trinidad and Tobago, Tunisia, and Yemen);
- V. A Government Official or a Politically Exposed Person (PEP) as defined in the FATF's 40 Recommendations;
- VI. A person or entity that poses a risk of invoking penalties, sanctions, or other liabilities under AML laws, CTF laws, Anti-Corruption laws, Economic Sanctions laws, or tax laws;
- VII. A person or entity that, as determined by XBTFX, is violating, causing others to violate, attempting or conspiring to violate, or evading or circumventing our Terms of Service or applicable laws within the United States or its Territories and Insular Possessions (whether directly or indirectly, and whether or not through a U.S. Financial Institution);
- VIII. A person or entity that fails to comply with the due diligence standards, requests, or requirements of XBTFX, or appears to present a high-risk profile based on the aforementioned factors or any other relevant indicators.

Should XBTFX decide not to refuse registration, access, or ongoing administration of your account, it reserves the right to conduct enhanced due diligence procedures. You may be subjected to these enhanced due diligence procedures in your use of the Site and any Service at any time.

If you refuse to provide the requested due diligence information, fail to respond in a timely or substantive manner to our requests, or do not comply with the documentation or data requirements, XBTFX retains the absolute discretion to immediately suspend or terminate services provided to you.

By adopting this AML-CFT policy, XBTFX reaffirms its commitment to upholding high ethical and legal standards, thereby contributing to the global fight against financial crime. We appreciate your cooperation in meeting these standards.