ANTI-MONEY LAUNDERING AND COUNTER FINANCING FOR TERRORISM POLICY

Last Revised: June 2026

1. INTRODUCTION

1.1. The Legit Traders LLC (hereinafter named "The Legit Traders" or ''the Company''), with registration number: 1945 LLC 2026 is incorporated in 156 Cromwell Road, International House, London, United Kingdom, SW7 4EF by the Registrar of Limited Liability Companies.

1.2. The Legit Traders is committed to meeting applicable anti-money laundering regulatory requirements pursuant to the requirements of the Financial Services Act, No. 33 of 2011, Proceeds of Crime Act, 2013 and 156 Cromwell Road, International House, London, United Kingdom, SW7 4EFs' Anti-Money Laundering Regulations and Code and global standards.

1.3. The Legit Traders is committed to ensuring the safety, security and efficiency of its products and services provided to the Users. [hereinafter the ''client(s)'', ''you(r)"]. To this end, The Legit Traders will always ensure that:

(a) Due diligence is carried out on the Users;

(b) The Legit Traders high ethical standards are always maintained; and

(c) Cooperation with the relevant regulators and other authorities is provided when appropriate.

1.4. By using these Services, you agree to the terms of this anti-money laundering and counter financing for terrorism policy ("AML Policy"). If you do not agree to this AML Policy, please do not use the Services (as defined in the Terms of Use). We reserve the right to make changes in this AML Policy, so please check back from time to time to ensure you are aware of any changes. Your continued use of the Services following any changes to the AML Policy signify your acceptance of these changes to the AML Policy.

2. LEGAL PROHIBITION OF MONEY LAUNDERING

2.1. Money laundering generally involves activity designed to conceal or disguise the true origins of the criminal proceeds of crime. Money laundering occurs in three (3) stages:

(a) Placement Stage

Direct asset(s) from criminal activities is converted into monetary or other instruments, such as payment in cash, exchange of bills, manual exchange, cryptocurrency or real estate, or deposited into accounts at financial institutions.

(b) Layering Stage

The converted assets are transferred or moved into other accounts or other financial institutions to further separate the money/asset from its original criminal source.

2.2. Terrorism financing involves an attempt to conceal either the origin of the asset/money or their intended use, such as a criminal purpose. Terrorism financing can involve legitimate sources of assets/money.

2.3. The law in 156 Cromwell Road, International House,London, United Kingdom, SW7 4EF where The Legit Traders is incorporated prohibits the use of the proceeds of crime from activity such as money laundering and the financing of terrorism. The 156 Cromwell Road, International House, London, United Kingdom, SW7 4EF law also requires The Legit Traders to report various activity to the authorities. Most jurisdictions in which The Legit Traders operates, or Users may be located, also have similar laws.

2.4. The Legit Traders will comply with all applicable legal and regulatory requirements and aims to prevent money laundering, financing of terrorism and any activity that facilitates money laundering, and financing terrorist or criminal activities.

2.5. Any User using or facilitating the use of any of the Services to facilitate the commission of money laundering, the financing of terrorism or other crimes such as fraud or misappropriation of assets (real or virtual) may have its Account(s) suspended or cancelled by The Legit Traders immediately it becomes aware of such User activity.

3. POLICY STATEMENT

3.1. The Legit Traders has implemented procedures and systems to prevent the occurrence of money laundering by adopting the principles in the Guidelines on Simplified Due Diligence issued by the Financial Services Authority, and to ensure adherence to the requirements.

3.2. The Legit Traders board of directors ("BOD") and senior management commits that The Legit Traders will uphold strict standards of integrity and ethical conduct. The Legit Traders will apply client due diligence ("CDD") measures by providing a safe, secure, and reliable know-your-client ("KYC") enabled offering to all its Users. The Legit Traders will provide its products and services meeting the Financial Action Task Force ("FATF") standards, and in accordance with any regulatory guidelines which may apply to The Legit Traders. The Legit Traders shall ensure compliance with the FATF recommendations and the amended AML/CFT code issued by the financial services authority of Saint Vincent and the Grenadines.

3.3. All The Legit Traders employees and officers will comply with this AML Policy. In addition, they are required to report any suspected cases of money laundering, terrorism financing, or any predicate crime to money laundering such as fraud or other illegal activity to senior management for appropriate action and if required by law to the relevant regulatory authorities.

3.4. The Legit Traders will conduct ongoing monitoring of business relationships, by giving special attention to complex, unusual, or large transactions lacking clear economic or legal purposes, as well as interactions with individuals in high-risk jurisdictions.

3.5. The Legit Traders will immediately stop acting and terminate any existing business relationship whenever unable to apply CDD or ongoing monitoring.

3.6. In cases where The Legit Traders receives a legal compulsion order, such as a warrant or subpoena, from legal or regulatory authorities relating to Users and/or User activity or transactions information, The Legit Traders will comply with such lawfully issued order.

3.7. The BOD has determined that The Legit Traders risk appetite is flexible for money laundering occurring through or on its platform, products, or services.

3.8. The Legit Traders will not knowingly allow its platform, products or services to be used for, or facilitate, the crime of money laundering and terrorism financing, or for any predicate crimes to money laundering such as but not exclusive to fraud.

4. AML/CFT COMPLIANCE OFFICER

4.1. The Legit Traders has appointed an anti-money laundering and countering financing of terrorism compliance officer ("AML/CTF Compliance Officer") responsible for the implementation maintenance of this AML Policy.

4.2. The AML/CFT compliance officer is the single point of contact for any inquiry about this AML Policy for both employees and Users. In the absence of the AML/CFT Compliance Officer, the operation manager of The Legit Traders should be contacted for any inquiry.

5. AML RISK ASSESSMENT

To ensure that The Legit Traders protects both The Legit Traders and our Users from regulatory and compliance risk related to money laundering, predicate offences to money laundering and financing of terrorism. The Legit Traders implements appropriate risk management measures by adopting the Guidelines on Conducting AML-CFT/CPF Institutional Risk Assessments, to assess our risks and determine how to appropriately manage and respond to identified risks. The Legit Traders will undertake regular risk management activities that include:

(a) Risk assessment of The Legit Traders operations
(b) Risk assessment of Users/KYC
(c) Risk assessment of The Legit Traders products and services prior to release for Users

6. KNOW YOUR CLIENT (KYC)

6.1. An important part of the risk assessment process involves due diligence when The Legit Traders takes on board its new Users.

6.2. The Legit Traders is committed to providing products, services and delivery mechanisms to its Users that are regulatory compliant and that involve e-KYC procedures to ensure The Legit Traders effectively combats money laundering. The due diligence process involves e-KYC identification and verification and requires Users to provide mandatory information for User acceptance before a business relationship and transaction activity commences. Then, KYC procedures will be carried out for User applying to The Legit Traders before the Accounts become active or transactions are conducted. E-KYC verification shall be conducted in accordance with the SVG FSA digital identity guidelines, and biometric verification may be required for high-risk clients.

6.3. The Legit Traders will obtain from the User at the time of application to commence a business relationship the required mandatory information and copies of identify documentation and/or in the case of a corporate User the relevant corporate documents, information on defined associated persons and any ultimate beneficial owners of The Legit Traders. On receipt of the required information and documents, The Legit Traders will complete a verification process before commencing User activity.

6.4. In some cases, an enhanced KYC process may be required for a User and will be carried out as required by either applicable law or FATF standards. Where a User is subject to enhanced KYC The Legit Traders may require additional information from the User to be able to satisfactorily complete the process.

7. INTERNAL CONTROLS

7.1. To meet the FATF standards, The Legit Traders management will ensure that The Legit Traders maintains an effective AML/CFT internal control structure. The management will create a culture of compliance to ensure staff adhere to The Legit Traders policies and procedures.

7.2. The AML/CFT internal controls are The Legit Traders policies, procedures and processes designed to limit and control money laundering and terrorism financing risks and to achieve compliance with FATF standards and any applicable regulations. The level of internal controls will be risk based as well as meeting any specific regulatory requirements.

8. CHANGES TO THIS POLICY

You are deemed to agree and consent to any changes in this AML Policy by way of your continued use of our Services.

9. AML POLICY AND TERMS AND CONDITIONS

The terms of this AML Policy are incorporated into the Terms of Use.