

PERPETUAL LIQUIDITY LIMITED

ANTI-MONEY LAUNDERING POLICY

This Anti-Money Laundering Policy (“Perpetual AML Policy” or “AML Policy”) is issued by **Perpetual Liquidity Limited** (“Perpetual”, “the Company”, “we”, “our”, or “us”), an International Business Company registered in **Saint Lucia** under registration number **2024-00241**, with its registered office located at **Ground Floor, The Sotheby Building, Rodney Village, Rodney Bay, Gros-Islet, Saint Lucia**.

1. Introduction

The Anti-Money Laundering Policy (“AML Policy”) outlines the strategy adopted by the Company to prevent, detect, and effectively combat money laundering and other financial crimes.

Our AML framework ensures that all financial transactions and client activities are monitored in accordance with applicable laws and international best practices. Entities engaging in financial transactions must maintain comprehensive records of their clients’ accounts and report any suspicious activities to the relevant authorities.

Financial institutions play a crucial role in collecting financial intelligence and supporting government agencies in preventing financial crimes.

2. Definition of Money Laundering

Money laundering is defined as the process of concealing the true origin of proceeds derived from criminal activities to make them appear as legitimate income. Criminals often target financial service providers to disguise illicit funds without the firms’ knowledge or suspicion.

3. Policy Objectives

The **Perpetual AML Policy** is designed to prevent money laundering and terrorist financing by adhering to legal and regulatory standards. The Company maintains adequate systems, controls, and procedures to mitigate the risk of being used as a channel for financial crime.

This Policy establishes the standards to be followed, which include:

- **Appointment of Money Laundering Reporting Officer (MLRO):**
The Director of the Company shall act as the Money Laundering Reporting Officer (MLRO) and shall be responsible for overseeing and ensuring the Company’s compliance with all applicable anti-money laundering (AML), counter-terrorism financing (CTF) laws, regulations, and relevant industry guidelines. The Director, in their capacity as MLRO, shall perform all duties and obligations required under applicable regulatory frameworks.

- **Client Due Diligence (CDD) and Know Your Client (KYC):**
Establishing and maintaining robust client identification and verification procedures, including enhanced due diligence for high-risk clients such as Politically Exposed Persons (PEPs).
- **Ongoing Monitoring:**
Implementing risk-based systems to continuously monitor client transactions and activities.
- **Reporting Procedures:**
Establishing internal reporting mechanisms for suspicious activities and reporting them to the relevant law enforcement authorities where appropriate.
- **Record Retention:**
Maintaining all relevant records for the minimum period prescribed by law.
- **Employee Training and Awareness:**
Providing continuous AML and CTF training to all relevant employees to ensure compliance and awareness.

4. Compliance Commitment

Perpetual is committed to maintaining the highest standards of **Anti-Money Laundering (AML)** and **Counter-Terrorism Financing (CTF)** compliance. In line with legal obligations, financial institutions are required to obtain, verify, and record identifying information for every client who opens an account.

Where the Company suspects that a client is involved in money laundering, terrorist financing, or any other illegal activity, it will report the matter to the relevant governmental or regulatory authorities.

Perpetual will not notify clients of any such reports. Any employee or representative who discloses this information (“tipping off”) may be subject to criminal prosecution, fines, and/or imprisonment.

5. Stages of Money Laundering

The process of money laundering generally involves three stages:

1. **Placement:**
Introducing illicit funds into the financial system through deposits, transfers, or purchases of high-value goods. Criminals may use techniques such as “smurfing” — making multiple smaller deposits to avoid detection.
2. **Layering:**
Moving or transferring funds across various accounts or instruments to obscure their origin and disrupt traceability.

3. **Integration:**

Reintroducing the laundered funds into the economy as seemingly legitimate assets or income through investments, purchases, or other financial activities.

6. Know Your Client (KYC) and Due Diligence

The formal identification and verification of clients are fundamental to our AML and KYC obligations. Before entering into any business relationship, **Perpetual** must obtain satisfactory evidence of a client's identity or implement equivalent verification measures.

Enhanced scrutiny is applied to clients or beneficial owners who:

- Reside in countries with inadequate AML standards, or
- Source funds from jurisdictions associated with higher risks of corruption or crime.

a. Individual Clients

During registration, each client must provide:

- Full name
- Date of birth
- Country of origin
- Complete residential address

To verify this information, clients must submit the following documents (with notarized English translations where applicable):

- A valid passport (photo and signature page clearly visible), **or**
- A driver's licence with a photograph, **or**
- A national identity card (front and back)
- Proof of residential address (e.g., recent utility bill or bank statement showing full name and address)

b. Corporate Clients

For corporate clients, documentation requirements differ based on the company's listing status:

- **Publicly Listed Companies:**
If listed on a recognized exchange, or if the applicant is a wholly owned subsidiary of such a company, further identity verification may not be required.
- **Private or Unlisted Companies:**
When principal directors or shareholders do not have an existing account with Perpetual, the following must be provided:

- Certificate of Incorporation or national equivalent
- Memorandum and Articles of Association (or equivalent statutory documents)
- Certificate of Good Standing or proof of registered address
- Board resolution authorizing account opening and designated signatories
- Signed shareholder structure
- Copies of any powers of attorney or authorizations granted by directors

7. Monitoring Client Activity

Perpetual continuously monitors all client transactions to identify patterns inconsistent with the client's known financial profile or declared business activities.

Suspicious transactions—those inconsistent with a client's legitimate business or historical behavior—are flagged for review.

The Company uses a combination of **automated and manual monitoring systems** to ensure early detection and reporting of suspicious activities.

8. Record Keeping

Perpetual maintains comprehensive records of all client identification data, transaction histories, and AML-related documentation, including suspicious activity reports and internal monitoring records.

All such records are retained for a **minimum period of seven (7) years** after the account is closed, in compliance with legal and regulatory requirements.

9. Deposit and Withdrawal Requirements

To comply with AML and CTF regulations, the following strict rules apply to all deposits and withdrawals:

- The Company does **not accept or send funds to third parties**.
- All deposits must originate from a bank account, credit/debit card, or alternative payment method held in the **same name** as the trading account with Perpetual.
- All withdrawals must be made to a payment method or bank account held in the **same name** as the trading account holder.
- Withdrawal requests are processed on a **first-come, first-served** basis and follow the same method as the original funding source.
 - Example: If a deposit was made via credit/debit card, withdrawals to that card cannot exceed the original deposit amount.

- Any profits exceeding the deposited amount will be transferred to a nominated bank account under the same name as the trading account.

10. Prohibited Jurisdictions and High-Risk Clients Policy

1. Restricted Jurisdictions

The Company shall not establish or maintain business relationships, open accounts, or provide services to any individual, entity, or beneficial owner who is:

1. A resident, national, or operating from a jurisdiction subject to comprehensive economic or trade sanctions imposed by the United Nations, United States (OFAC), European Union, or United Kingdom;
2. Located in a jurisdiction identified by the Financial Action Task Force (FATF) as a **High-Risk Jurisdiction subject to a Call for Action**;
3. Located in a jurisdiction where the offering of leveraged foreign exchange or derivative products would be unlawful, require local licensing not held by the Company, or expose the Company to regulatory enforcement risk;
4. Listed on any sanctions list, including but not limited to:
 - UN Sanctions List
 - OFAC Specially Designated Nationals (SDN) List
 - EU Consolidated Sanctions List
 - UK HM Treasury Sanctions List.

2. Countries Typically Classified as Non-Acceptable Risk

Based on international sanctions frameworks and FATF guidance, the Company does not onboard clients connected to jurisdictions such as:

- Iran
- North Korea
- Syria
- Cuba
- Myanmar
- Afghanistan
- Yemen
- Somalia

- Sudan / South Sudan
- Libya
- Any sanctioned regions or territories subject to international restrictions.

11. Oversight and Review

The Director of the Company, in their capacity as the appointed Money Laundering Reporting Officer (MLRO), shall have ultimate responsibility for the oversight, implementation, and enforcement of this Prohibited Jurisdictions and High-Risk Clients Policy.

The Director shall:

- Review and approve the list of restricted or high-risk jurisdictions on a periodic basis, and at least annually;
- Ensure that the policy remains aligned with current international sanctions programs, FATF guidance, and applicable AML/CFT obligations;
- Approve any amendments, risk reclassifications, or exceptions (if permitted under extraordinary circumstances);
- Maintain records of such reviews and decisions as part of the Company's AML compliance framework;
- Ensure that appropriate internal controls, screening systems, and due diligence procedures are effectively implemented and monitored.

ADDENDUM NO. 1

This Addendum ("Addendum") is made and entered into on **27 February 2026**, and forms an integral part of the **Anti-Money Laundering (AML) Policy** (the "Policy") adopted by:

Perpetual Liquidity Limited an International Business Company registered in Saint Lucia under registration number 2024-00241, with its registered address at Ground Floor, The Sotheby Building, Rodney Village, Rodney Bay, Gros-Islet, Saint Lucia (the "Company").

1. PURPOSE OF THIS ADDENDUM

This Addendum is issued to enhance the Company's AML/CFT and Sanctions Compliance controls in line with international best practices, Financial Action Task Force (FATF) recommendations, and the Company's internal risk-based approach to client acceptance and monitoring.

2. INSERTION OF NEW SECTION — SANCTIONS AND HIGH-RISK JURISDICTIONS

The AML Policy shall be amended by inserting the following section:

Restricted Jurisdictions and Sanctions Compliance

Based on international sanctions frameworks, FATF guidance, and the Company's internal compliance and risk assessment policies, the Company shall not onboard, establish relationships with, or provide services to individuals or entities who are residents of, incorporated in, operating from, or otherwise connected to the following jurisdictions:

- Iran
- North Korea
- Syria
- Cuba
- Myanmar
- Afghanistan
- Yemen
- Somalia
- Sudan
- South Sudan
- Libya
- Belarus
- Russia Federation

The Company further reserves the right to reject, suspend, or terminate any client relationship where exposure to sanctioned persons, entities, or territories is identified, including those subject to restrictions imposed by the United Nations, European Union, United Kingdom, United States, or other applicable authorities.

3. GOVERNANCE AND REVIEW

These restricted jurisdictions list shall be reviewed periodically as part of the Company's AML risk assessment framework.

Any amendment, inclusion, or removal of jurisdictions must be documented and approved by the Director.

4. NO OTHER AMENDMENTS

Except as expressly amended by this Addendum, all other provisions of the AML Policy remain unchanged and in full force and effect.

5. EFFECTIVE DATE

This Addendum shall take effect on **27 February 2026** and shall apply to all new and existing clients from that date onward.