

## AML & KYC Policy

### 1 . Anti-Money Laundering (AML) policy

Otet Group Ltd. (hereinafter called as the “Company” or “we” or “our” or “us”) is registered and authorised by the Marshall Islands by number 118922. The Company is working hard to create a culture that helps detect and report any incidences of money laundering and/or terrorist financing. The company is committed to be in compliance with all applicable laws and regulations regarding anti money laundering and terrorist financing in the Cayman Islands.

### 2. Money Laundering and Terrorist Financing

It is our major responsibility, among others, to prevent money laundering and terrorist financing. On one hand, the money laundering is a financial crime committed by someone who is making the possession, use or disposal of money or other property obtained from criminal activities appear to be legal. On the other hand, terrorist financing is the process by which terrorists fund their operations in order to perform terrorist acts. Terrorists need financial support to carry out their activities and to achieve their goals. There is little difference between terrorists and other criminals in their abuse of the financial system. While different from money laundering, terrorists often exploit similar weaknesses in the financial system. The Anti Money Laundering Compliance Program is designed to prevent the firm from forming business relationships or from carrying out one-off transactions with or for another person or client unless the firm can: Clearly establish the identity of the person or client;

Maintain record keeping procedures in accordance with applicable laws and regulations; and Apply appropriate internal controls and communication.

- o The Company has put in place a robust governance framework throughout the organisation for managing risk and AML compliance.
- o The Company’s AML governance framework is made up of the following core components; Responsible Board oversight; A strong and independent Money Laundering Compliance Officer (MLCO); Adoption of the risk-based approach as per the Cayman AML regulations and laws, as amended from time to time; Policies and Procedures; and Ongoing organisation wide Training.

### 3. Due Diligence Procedures

Identify a customer, whether a customer in an established business relationship or a one-off transaction, and whether natural, legal person or legal arrangement and shall verify the customer's identity using reliable, independent source documents, data or information; Verify that a person purporting to act on behalf of a customer is properly authorized and identify and verify the identity of the person;

Identify a beneficial owner and take reasonable measures to verify the identity of the beneficial owner, using the relevant information or data obtained from reliable sources, so as to be satisfied that the person knows the identity of the beneficial owner; Understand and obtain information on, the purpose and intended nature of a business relationship; and Conduct ongoing due diligence on a business relationship including o Scrutinising transactions undertaken throughout the course of the business relationship to ensure that transactions being conducted are consistent with the person's knowledge of the customer, the customer's business and risk profile, including where necessary, the customer's source of funds; and o Ensuring that documents, data or information collected under the customer due diligence process is kept current and relevant to customer due diligence, by reviewing existing records at appropriate times, taking into account whether and when customer due diligence measures have been previously undertaken, particularly for higher risk categories of customers. The Company follows the domestic legislation as required by Marshall Islands, however we do follow stricter rules and legislation when it comes to AML procedures and will continue to keep in place the AML procedures in order to safeguard and act honestly, fairly always acting in the best interest of the clients. The Company also has a policy of processing withdrawals only to the same bank accounts as initial deposits.

### 4. Confidentiality

The personal data we receive is handled in accordance with the provisions of the Privacy Policy. Please note that the reason for the identification procedure is to comply with laws against money laundering and financing terrorism, not because we suspect you of committing illegal acts.

Accordingly, your cooperation and understanding of these steps is necessary to effectively combat money laundering and financing terrorism. Each of the affiliates of the Company is required to comply with AML and KYC policies. All identification documents and services records shall be kept for the minimum period of time required by the law. All new employees shall receive anti money laundering training as part of the mandatory new-hire training program. All applicable employees are also required to complete AML and KYC training annually. Participation in additional targeted training programs is required for all employees with day-to-day AML and KYC responsibilities. This policy is intended for the protection of the Company and our clients. If you have any questions about the policy, please contact: [info@otetmarkets.com](mailto:info@otetmarkets.com)