



Anti-Money Laundering (AML) POLICY STATEMENT

Tech4Capital LLC (or “Tech4Capital”) is incorporated in Comoros with registration number HY01123057 and with registered address at Bonova Road, Fomboni, Comoros, KM.

Tech4Capital LLC, is committed to upholding the highest standards of integrity and transparency in its operations. As a financial services provider, we recognize our responsibility to prevent money laundering, terrorist financing, and other financial crimes. This Anti-Money Laundering (AML) Policy Statement outlines our commitment to comply with all applicable laws, regulations, and international standards to detect, prevent, and report any money laundering or financial crime activities.

Purpose and Scope

The purpose of this AML Policy Statement is to establish a robust framework to ensure Tech4Capital LLC remains compliant with all relevant AML regulations, guidelines, and best practices, including the Financial Action Task Force (FATF) Recommendations, the United Nations (UN) resolutions, and other international standards. This policy applies to all employees, directors, officers, and third-party service providers of Tech4Capital LLC and covers all our products, services, and customer relationships.



AML Compliance Program

To effectively implement our AML Policy, Tech4Capital LLC has established a comprehensive AML Compliance Program which applies to all clients with all personnel instructed to adhere to. This program consists of the following key components:

Know Your Client (KYC)

At a bare minimum all sign-ups from would be clients must be accompanied by authentic government issued “proof of identity” such as passports or drivers licenses. A “proof of residence” or “valid address” must be provided in the form of a utility bill or bank statement under the name of the prospective client. The names and addresses indicated in the accompanying documents must match those submitted by the client in the application forms.

Personnel processing applications are reminded to be wary of signs of tampering or manipulation of images for the supporting documentation. Any signs of irregularity in the documentation shall be grounds for denying verified status.

Juridical Entity KYC

Where a client is a ‘juridical entity’ registration documents of the organization with a relevant government authority must be submitted along with utility bills or bank statement to establish an official address. A “Letter of Authorization” or “Board Resolution” must be submitted indicating that permission to open such an account has been granted to the authorized representative.



The authorized representative, and ultimate beneficial owners in the case of trusts and limited partnerships, shall be required to submit a “proof of identity” and “proof of residence” as per standard Know Your Client procedure.

Customer Due Diligence (CDD)

After the initial KYC for account opening the company conducts regular customer due diligence activities which may involve enhanced background checking of client identities and funding sources through various means. An enhanced CDD process is adopted with respect to “exposed persons” who are deemed to have a higher risk of being involved in or facilitating financial crimes due to their positions, associations, or activities.

If you can be described in any of the following manner then you are considered an “exposed person”:

- hold or have held prominent public positions, such as government officials or a high-ranking military officer, you are considered politically exposed
- family member or close associate of a politically exposed person.
- senior manager or key personnel of a financial institution or regulator
- in a sensitive occupation such as lawyer, accountant, or real-estate agent

Lawful Capital and Funding Channel

Monies used to fund client wallets shall be sourced from accounts with which they have legal ownership of, i.e. accounts must be in their names matching the registered client name. Clients guarantee that any deposits made are sourced or generated through



legal means. The company reserves the right to conduct internal investigations without prior notice on suspicious client activity as part of its CDD and Risk Assessment processes.

Findings of “Layering” or any attempts at introducing illegally obtained funds will result in the cessation of the business relationship and cancelation of any payments. The company will be guided by applicable laws, FATF recommendations, or common practice in its actions.

Risk Assessment

The company conducts regular analysis of its books on client trading behavior as part of its risk management strategies. Such analysis of client trading may also be used to identify potential efforts at money laundering by clients or a network of clients using zero sum strategies to obfuscate ownership of and conduct a transfer of funds from multiple accounts.

We reserve the right to communicate with law enforcement agencies and other financial institutions, and conduct enhanced CDD efforts to determine the authenticity of trading activities and/or ascertain relationships among the parties involved.

Withdrawal Policies

To forestall any attempt at “Integration” the company is adopting a same channel, no third-party withdrawal rule. This means all withdrawals shall be serviced only to the source accounts of a client’s deposit. In the event that the source accounts are no



longer available or have been closed withdrawals will only be serviced using the same platform or channel used for depositing and matching the client identity on record. In practice this will mean funding received through banks will be serviced through banks, funding in cryptocurrencies will be serviced in crypto currencies, credit card payments will be serviced through the credit card networks, payments in general will be serviced through the same gateway.

Record-Keeping and Law Enforcement

We maintain accurate, complete, and up-to-date records of all customer identification data, transaction records, and other relevant documents for a minimum of five years or as required by the applicable regulations. We comply with all regulatory reporting requirements, including suspicious activity reports (SARs), currency transaction reports (CTRs), and any other relevant reports to the appropriate authorities.

We will provide relevant information to competent regulatory and law enforcement agencies upon formal request in connection with criminal investigations and judicial action.

Independent Audit

We may engage an independent, qualified party to conduct periodic audits of our AML Compliance Program to ensure its effectiveness, identify areas for improvement, and address any identified deficiencies.

Prohibited Countries and Jurisdictions

Tech4Capital LLC is a limited liability company registered with MWALI INTERNATIONAL SERVICES AUTHORITY under Registration No. HY01123057 as an international brokerage and clearing house with License No. T2023411. Its registered office is at Bonovo Road – Fomboni, Island of Mohéli – Comoros Union.



As a first step in preventing “Placement” in money laundering and/or terrorist financing Tech4Capital LLC does not accept accounts from countries under the FATF blacklist as of June 2023:

- Democratic Peoples Republic of Korea
- Iran
- Myanmar

Accounts whose owners are residents of FATF Grey List countries may be subject to enhanced scrutiny under the Client Due Diligence procedures. Due to “extraterritorial jurisdiction” issues we do not accept citizens and residents of the United States of America as clients.

Right Of Refusal and Termination

Notwithstanding compliance with the listed component of the AML Compliance Program, the company reserves the right to require further documentation. None compliance will result in refusal of an application, or termination of an ongoing relationship if clients proved to be none compliant.

Sanctions and Penalties for Staff and Officers

Non-compliance with this AML Policy, the AML Compliance Program, or any applicable laws and regulations may result in disciplinary action, up to and including termination of employment, as well as civil and criminal penalties under the relevant laws and regulations.



Tech4Capital LLC LTD is committed to maintaining a strong and effective AML Compliance Program to protect our reputation, customers, and the integrity of the financial system. We will continue to monitor and update our AML Policy and procedures to ensure compliance with all applicable laws, regulations, and international standard.

Tech4Capital LLC is a limited liability company registered with MWALI INTERNATIONAL SERVICES AUTHORITY under Registration No. HY01123057 as an international brokerage and clearing house with License No. T2023411. Its registered office is at Bonovo Road – Fomboni, Island of Mohéli – Comoros Union.