



ANTI-MONEY LAUNDERING POLICY

Prime Capital LTD has policies in place to ensure that customers engaging in certain activities are identified to a reasonable standard, while minimizing the compliance burden and impact on legitimate customers.

Terms

MONEY LAUNDERING is the act of converting money or other monetary instruments obtained from illegal activities into money or investments that appear to be legitimate, so that their illicit source cannot be traced. National and international laws that apply to companies whose customers can deposit and withdraw funds from their accounts prevent Prime Capital LTD, its employees or agents from knowingly engaging or attempting to engage in money transactions involving criminal property.

PROCEDURES IMPLEMENTED

The aim of the anti-money laundering procedures that Prime Capital LTD implements is to ensure that customers engaging in certain activities are identified to a reasonable standard, while minimizing the compliance burden and impact on legitimate customers. Prime Capital LTD is committed to helping governments combat the threat of money laundering and terrorist financing around the world. For this purpose, Prime Capital LTD has developed a highly advanced electronic system. This system documents and verifies customer identification records, and tracks and maintains detailed records of all transactions. Prime Capital LTD closely monitors suspicious and significant transaction activity and reports such activity by "providing full and timely information" to law enforcement. In order to maintain the integrity of corporate reporting systems and safeguards, the legal framework provides legal protection to the providers of such information. To minimize the risk of money laundering and terrorist financing, Prime Capital LTD

AML Policy does not accept cash deposits or withdraw cash under any circumstances. Prime Capital LTD reserves the right to refuse a transfer at any stage if it believes that the transfer is in any way related to money laundering or criminal activity. For the avoidance of doubt, Prime Capital LTD may stop or defer payments for a specified period at its sole discretion. Prime Capital LTD has no right to inform customers that they have been reported for suspicious activity.