

ANTI MONEY LAUNDERING (AML) POLICY

Money laundering is the act of converting money or other material values gained from illegal activity (including terrorism, drug trafficking, illegal arms trade, etc.) into money or investments that appear to be legitimate.

BNFX Capital Limited ("the Company") has implemented an Anti Money Laundering policy and is committed to help international organizations combat money laundering and funding of criminal activities.

IMPLEMENTED PROCEDURES

The objective of the Company's anti-laundering procedures is to ensure that its customers are identified to a reasonable standard while minimizing the burden on legitimate and compliant customers.

1. The Company collects and verifies identification data of every Client and also logs and tracks itemized statements of all transactions carried out by the Client. Prior to the opening of any account the Client's government-issued photo identification document and proof of address is verified by the Company.
2. The Company tracks and maintains detailed records of all transactions, and is obliged to report suspicious activities and transactions to law enforcement authorities.
3. In order to discourage money laundering and other criminal activities, the Company neither accepts cash deposits nor disburses cash under any circumstances.
4. The Company reserves the right to refuse to process a transfer at any stage where it believes the transaction to be connected in any way to money laundering or other criminal activity. In compliance with international law, the Company is not obliged to inform the Client that he/she/it has been reported for suspicious activity.
5. The Company requires that all payments or deposits, where the name of the Client is present, to originate from an account under a name that matches the name of the Client in the Company's records. No third party payments shall be accepted, and no third party refunds or withdrawals shall be remitted.
6. In case of withdrawals, funds must be withdrawn to an account under the same name (and residential address, in the case of wire transfers) as that of the original funding source. The account name must also match the name of the Client in the Company's records.

The Company shall regularly update its electronic systems for inspection of suspicious transactions and for verification of client identification records in accordance with the New Zealand Anti Money Laundering and Countering Financing of Terrorism Act 2009 and any new regulations as they come into force within the Company's jurisdiction, as well as providing training for its employees on enhancements to Anti Money Laundering procedures that may be required by new regulations.

