



Anti-Money Laundering Policy

Updated on: July 2024

1. PREFACE GiiMe Ltd. (the “Company”) is a proprietary trading firm that operates platforms for evaluation of potential traders (the “Platform”). The Platform offers several simulated training programs to evaluate the potential traders’ abilities (“Evaluation”) as well as educational resources. If a user successfully completes the Evaluation and the verification process, the Company may offer them the opportunity to become a funded user and reward them based on their trading success (“Funded User”).

Money laundering, Financing of Terrorism, and violations of international sanctions all threaten this experience by exploiting the Platform provided and operated by the Company for malicious purposes.

The Company takes a no tolerance approach to money laundering and terrorist financing and is committed to upholding all laws relevant to anti-money laundering and counter-terrorist financing in the applicable jurisdictions. The Company is committed to implementing appropriate and effective policies, procedures, and controls to prevent those activities. The Company’s policies are shaped by industry best practices, a risk-based approach, and the effective anti-money laundering and sanctions application approach recommended, among others, by the US and the EU.

The formulation and adoption of the Anti-Money Laundering, Terrorist Financing, and Sanctions Implementation (the “AML/Sanctions Policy” or the “Policy”) has important benefits for the Company and for its officers and employees. These benefits include, among others, the possible protection from criminal and administrative proceedings against the Company and its officers and employees, possible mitigation in said proceedings in the event they take place, clarification of ambiguous business practices and greater certainty in the field regarding what is forbidden and permissible, maintaining the Company’s reputation as law-abiding, maintaining the trust of investors in the Company, and more.

This policy is aimed to apply to the Company and any of its fully owned affiliates and any Platforms it may operate from time to time.

2. OVERVIEW The Platform includes access to tools for simulated exchange trading or trading with other instruments on other financial markets, the provision of analytical tools, training and educational materials, and other ancillary services.

In order to access the Evaluation stage, the users pay a fee that is determined based on the Evaluation program the users select. The Company accepts funds from users by credit cards,

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bank transfers, E-wallets/E-money in fiat or cryptocurrencies through recognized service providers. Funded Users may be entitled to a payout of their rewards as a sole compensation, calculated on an allocation of their trading profits (“Payout”). Therefore, the Company acknowledges the necessity of this AML/Sanctions Policy in order to prevent improper use of the Platform.

The Company’s AML/Sanctions Policy is tailored to the types of products and services offered by the Company, and the locations in which such products and services are offered. The Company’s customized AML/Sanctions Policy reflects the Company’s customer or client base, products, services, supply chain, counterparties, transactions, and geographic locations. This Policy will include procedures designed to address the risks identified in the Company’s risk assessment.

The AML/Sanctions Policy aims to set out the standards of conduct and professionalism that apply to all individuals employed by the Company, including officers and directors, in relation to this AML/Sanctions Policy and applicable laws. The Company’s policy is to apply at a minimum the standards set out in this policy.

The purpose of this text is to provide to the Company’s Clients, Providers, Partners, Vendors, Contractors, Employees, Law enforcement, and other concerned stakeholders a high-level and summarized overview of the Company’s main AML and sanctions implementation policies and procedures. By no means is this content to be considered as the whole set of all policies, procedures, and controls that are implemented and in place by the Company for prevention of money laundering, financing of terrorism, and other forms of illicit activity.

The Company’s senior management’s commitment to, and support of, this Policy is one of the most important factors in determining its success. This support is essential to ensuring the AML/Sanctions Policy receives adequate resources and is fully integrated into the Company’s daily operations, and also helps legitimize the program, empower its personnel, and foster a culture of compliance throughout the Company.

The Company’s senior management shall take actions that discourage misconduct and prohibited activities, in order to send a strong message that highlights the potential repercussions of non-compliance with the AML/Sanctions Policy.

Managers at all levels are responsible for ensuring their subordinates are aware of and understand this AML/Sanctions Policy and for responding to questions regarding Policy. All Company employees are responsible for ensuring compliance with this AML/Sanctions Policy and for reporting any actual or suspected violations of the policy.

Ms. Flora Antoniadou, the Company’s compliance officer (CCO), as the compliance officer serving as the entity responsible for the implementation and enforcement of this policy in the Company.

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There is an obligation to contact the CCO at any time with any question concerning the AML/Sanctions Policy and there is also an obligation to contact her in any case where the applicant knows or believes there is a violation of this policy or any other failure in its implementation. You can contact the CCO at any time by phone and/or email.

3. **APPLICABILITY** This Policy applies to all persons working for, or on behalf of, the Company and any of its affiliates in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, and interns (collectively, the "Covered Person(s)"). Where appropriate, the Policy applies to agents, contractors, external consultants, third-party representatives, business partners, sponsors, or any other person associated with the Company, wherever located.

The Company operates in a highly innovative industry, and the regulation of its business is in its early stages, and highly dynamic. Thus, the Company opted to take a conservative and cautious approach. Hence, procedures and obligations required by the AML/Sanctions Policy are not necessarily required by law.

4. **DEFINITIONS APPLICABLE TO THE POLICY** Money-Laundering ("ML") can be defined as 'the process by which the proceeds of criminal activity are dealt with in a way to conceal or disguise their illicit criminal origins'. Typically, ML consists of three stages:
 - **Placement:** the physical disposal of criminal proceeds where the money launderer attempts to place cash into the financial system.
 - **Layering:** the separation of criminal proceeds from their source by the creation of 'layers' or a sequence of transactions designed to disguise the audit trail and provide the appearance of legitimacy.
 - **Integration:** the conversion of the criminal proceeds, for example, into real estate, property, or investments, so that they appear to be legitimate funds or assets.

Criminal activity can include any kind of conduct that would be a criminal offense in any country in which the Company operates, including but not limited to terrorism, drug trafficking, activities of criminal organizations, corruption, fraud, theft, tax evasion, or other tax-related offenses.

Terrorist Financing ("TF") means the provision or collection of funds or assets, by any means, directly or indirectly, with the intention that they should be used or in the knowledge that they are to be used, in full or in part, to carry out terrorist activities.

The Company understands violations of Sanctions to include all violations of sanctions imposed on countries or persons by the US, the EU, and any other jurisdiction in which the Company operates (whether they are defined as sanctions any other term e.g. "Restrictive measures").

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5. **RISK ASSESSMENT** The Company takes a risk-based approach towards assessing and containing the money laundering, terrorist financing, and sanctions violation risks arising from any transactions it has with users of the Platform and uses all available data when reviewing users' activity.

Overview

There is the potential for a money launderer at each of the above stages. For instance, in online purchasing of the Evaluation program, where electronic transfers are required for placements, identity theft and identity fraud may enable a money launderer to move criminal proceeds with anonymity.

The use of multiple internet transactions may facilitate the layering stage of ML.

ML may also arise from simple criminal spend ('Proceeds of Crime').

Covered Persons may also facilitate ML by colluding with customers or other third parties or dishonestly manipulating records or processes.

Specific Risks

- Users could use illicit funds to pay for evaluation fees, which can be challenging to track without thorough checks.
- Criminals might use fake or stolen identities to create accounts and launder money.
- Criminals may use stolen identities or hacked accounts, effectively laundering money through the Platform.
- Unusual trading behaviors, such as high-frequency trades with little financial logic, may indicate money laundering.
- Users may pay evaluation fees through various means, such as through intermediaries or third-party payment processors, to obscure the origin of funds.

Analysis

The assessment of risk factors undertaken shows that the main risks involve the use of the platform not for normal use, but for other purposes. When a person uses the Platform for educational and prop trading purposes, there is only a remote chance that the transaction would be part of a plan to launder money, transfer funds, or bypass sanctions. Such risks become significant when the activity on the Platform does not reflect its normal.

Hence, the guidelines and procedures included in the AML/Sanctions Policy aim to differentiate between cases in which persons use the Platform for its intended purposes and pose no significant risk of illicit activity, and cases in which the person uses the Platform in

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ways which might seem to be outside the normal course of business. It is in these latter cases that this Policy focuses.

6. GUIDELINES These guidelines detail the way in which this AML/Sanctions Policy responds to the risks mentioned above. It applies to all users of the Platform.

Sources of Information

In addition to information gathered by the Company, as detailed below, the Company relies on external sources in order

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