

Statement on Anti-Money Laundering, Counter-Terrorist Financing (AML/CTF) and Sanctions Policy

XHK Ltd (hereinafter “Company”), terms “XHK Ltd” and the “Company” to be used interchangeably, is committed to high standards within financial crime compliance. It is a priority across the entire company to stay focused on the risks, prevent regulation breaches and avoid facilitating clients or transactions involved in financial crime.

The Company acts in transparency and cooperation with applicable supervisors and regulatory requirements and law enforcement guidelines issued by them.

The Company has a responsibility to its customers and regulators to prevent the Company from being used to facilitate the usage of illegal proceeds or movement of funds intended to finance terrorism and violation of international sanctions regimes.

AML/CTF and Sanctions compliance is an integral part of the overall compliance culture within the company. The Company is committed to identify and understand the risks of potential ML/TF (money laundering and terrorist financing) and Sanctions violations and manage those to which the company is exposed. XHK Ltd takes proportionate measures required to mitigate acknowledged risks and applies consistent AML/CTF and Sanctions compliance standards and procedures to prevent the use of products, services, or channels for purposes of money laundering and terrorist financing or violation of international sanctions regimes.

Ultimately, the Management Board of the Company is collectively responsible for ensuring that activities of the Company comply with applicable regulations and internal requirements. It is the policy of the Management Board and Senior Management of XHK Ltd to actively prevent money laundering and activities that facilitate money laundering, funding of terrorist or criminal activities, or potential violations of the applicable sanctions regimes.

Preventive measures

To detect and mitigate potential illegal activities, XHK Ltd has adopted a policy on the prevention of money laundering and counter-terrorist financing that requires all parts of the Company to develop and implement effective programmes to comply with applicable laws.

The document defines good practices covering as a minimum:

- Proper **Know-Your-Customer** (KYC) practices. Knowledge of the customer, its financial activity, source of funds and type of financial activity helps to understand the general activities in which the customer would usually be expected to engage.
- **Customer Due Diligence** (CDD) includes, among other things, identifying the customer and verifying the customer's identity on the basis of reliable documents, data or information obtained from trustful and independent sources.
- Sufficient knowledge of the **ownership** (including ultimate beneficial owners of the customer) and control structure of our customers.
- The initiation or maintenance of a business relationship with a **PEP** (a person holding a politically exposed position, and the family members and well-known close associates of this person, through their position and influence, are considered to have a position which in itself constitutes a risk of being exploited for, among other things, bribery) or other relevant high-risk customer needs to be approved by an authorised decision-maker.
- The Company performs **daily screening** of the customer base against financial sanctions and PEP lists. All payments are also screened in real time to ensure compliance with international sanctions.
- **Suspicious activity and transactions reporting** obligations. The Company has a process in place to report suspicious transactions as per applicable regulations. Furthermore, the employees of the Company are trained to be able to detect suspicious transactions when they occur and report them to MLRO (Money Laundering Reporting Compliance Officer).
- Identification of transactions that infringe US, OFAC, UK, UN and EU **Sanctions Regimes** and sanctions monitoring responsibilities.