Anti-Money Laundering, Counter-Terrorist Financing & Sanctions Policy and Procedures

MYFX GROUP LIMITED trading as IconFX
Version 1.0 | August 2026

1. Introduction

MYFX GROUP LIMITED, operating under the tradename **IconFX** ("IconFX", "the Company", "we", "us" or "our"), is committed to maintaining high standards of integrity and to preventing its products, services and infrastructure from being used for money laundering, terrorist financing, proliferation financing, sanctions evasion, fraud or other financial crime.

The Company is incorporated in the Republic of Seychelles under incorporation number **8435863-1** and is authorised and regulated by the **Seychelles Financial Services Authority ("FSA")** as a Securities Dealer under licence number **SD202**.

IconFX maintains a risk-based Anti-Money Laundering and Counter-Terrorist Financing ("AML/CTF") framework designed to comply with applicable Seychelles legislation, regulatory requirements and internationally recognised AML/CTF principles.

This Policy applies to customers, prospective customers, beneficial owners, authorised persons and, where appropriate, counterparties and other parties with whom the Company conducts business.

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2. Purpose

The purpose of this Policy is to establish the principles and procedures used by IconFX to:

- identify and verify customers;
- identify beneficial owners and persons exercising control;
- assess money laundering, terrorist financing and sanctions risk;
- identify Politically Exposed Persons ("PEPs"), their family members and close associates;
- screen customers against applicable sanctions and financial crime databases;
- monitor customer relationships and transactions;
- identify unusual or potentially suspicious activity;
- apply Enhanced Due Diligence ("EDD") where appropriate;
- maintain appropriate records;
- escalate potential financial crime concerns internally; and
- comply with applicable reporting and regulatory obligations.

IconFX operates a **risk-based approach**, meaning that the level of due diligence and monitoring applied may vary according to the risks associated with a particular customer, jurisdiction, activity, product, transaction or business relationship.

3. Customer Due Diligence and Know Your Customer

IconFX conducts Customer Due Diligence (“CDD”) and Know Your Customer (“KYC”) procedures as part of the account-opening process.

Depending on the customer and assessed level of risk, information and documentation requested may include:

- full legal name;
- date and place of birth;
- nationality and country of residence;
- residential address;
- government-issued identification;
- contact information;
- occupation and employment information;
- source of funds;
- source of wealth, where appropriate;
- expected account activity and purpose of the relationship;
- corporate registration and ownership documentation for legal entities;
- directors, shareholders and authorised representatives; and
- ultimate beneficial ownership and control information.

IconFX may use electronic verification systems, trusted databases, documentary evidence and other appropriate sources to verify information supplied by customers.

IDWise

As part of its AML/CTF framework, IconFX uses **IDWise**, a specialist identity verification, e-KYC and AML compliance technology provider, to support customer identification, verification and financial crime screening.

Further information regarding IDWise is available at **www.idwise.com**.

IDWise technology assists IconFX in conducting identity verification and screening against global PEP, sanctions, regulatory enforcement, adverse media and other relevant financial crime data sources.

The use of third-party compliance technology does not replace IconFX's own compliance responsibilities. Screening alerts and higher-risk relationships are reviewed and managed in accordance with the Company's internal AML/CTF procedures.

IconFX reserves the right to request additional information or documentation at any stage of the customer relationship.

4. Daily AML, PEP and Sanctions Screening

Financial crime screening is not limited to the point at which a customer opens an account.

IconFX conducts daily monitoring and screening processes for AML, Politically Exposed Person ("PEP") and sanctions-related risks, supported by IDWise's screening and ongoing monitoring technology.

Customers are screened during onboarding and are subject to ongoing monitoring throughout the business relationship.

The Company's screening framework may include:

- **Politically Exposed Persons (PEPs)**;
- family members and close associates of PEPs, where identified;
- international and national sanctions designations;
- terrorism-related designations and watchlists;
- regulatory and law-enforcement information;
- financial crime and enforcement records;
- adverse media and negative news;
- people of interest and other relevant risk databases; and
- other financial crime intelligence considered appropriate by the Company.

Ongoing monitoring enables IconFX to identify relevant changes to a customer's risk profile after onboarding, including new sanctions designations, changes in PEP status, regulatory information, adverse information or other relevant financial crime risk indicators.

Where a new match or material change is identified, the matter may be escalated to the Company's Compliance function for review.

A screening alert does not necessarily mean that a customer has engaged in wrongdoing. IconFX takes reasonable steps to determine whether an alert represents a genuine match and what action, if any, is appropriate.

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5. Politically Exposed Persons

A Politically Exposed Person is generally an individual who is or has been entrusted with a prominent public function.

PEP status does not, by itself, mean that an individual is involved in criminal activity or is prohibited from becoming a customer of IconFX.

However, because of the increased risks that may arise from certain public functions, IconFX applies additional risk-based controls where a customer or beneficial owner is identified as a PEP, or as a relevant family member or close associate of a PEP.

Such measures may include:

- Enhanced Due Diligence;
- obtaining additional information regarding source of funds;
- establishing source of wealth;
- obtaining further information regarding the purpose and intended nature of the account;
- senior management or Compliance approval;
- enhanced transaction monitoring; and
- more frequent review of the business relationship.

PEP relationships are assessed individually according to the circumstances and risks presented.

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6. Sanctions Compliance and Screening

IconFX maintains sanctions controls designed to prevent the Company from establishing or maintaining prohibited relationships or facilitating prohibited transactions involving sanctioned persons, entities, organisations or other designated parties.

Through **IDWise's global screening infrastructure**, IconFX screens customers against major international and national sanctions data sources.

These include, where applicable:

- **United Nations (UN) Security Council sanctions lists**;
- **United States Office of Foreign Assets Control (OFAC)** sanctions lists, including the Specially Designated Nationals and Blocked Persons (“SDN”) List and applicable Non-SDN lists;
- **European Union (EU) sanctions lists and consolidated financial sanctions data**;
- **United Kingdom sanctions designations and applicable UK financial sanctions data**;
- **Australian Department of Foreign Affairs and Trade (DFAT) sanctions data**; and
- other relevant national, international, regulatory and law-enforcement watchlists available through the Company's screening and compliance systems.

IconFX may supplement these controls with additional screening, intelligence or compliance review where considered appropriate.

Potential Sanctions Matches

Where a potential sanctions match is identified through IDWise or another compliance control, IconFX will review the alert to determine whether it represents a genuine match.

Depending upon the circumstances and applicable legal requirements, IconFX may:

- place an application, account or transaction under review;
- request additional identification or supporting information;
- prevent or delay the processing of a transaction;
- restrict account activity;

- apply Enhanced Due Diligence;
- reject an application;
- suspend or terminate a business relationship;
- freeze or restrict assets where legally required; and/or
- make a notification or report to the appropriate authority where required by applicable law.

A potential screening match does not automatically establish that a customer is sanctioned or has participated in financial crime.

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7. FATF and Jurisdictional Risk

In addition to individual and entity sanctions screening, IconFX takes into consideration country and jurisdictional risk information published by the **Financial Action Task Force ("FATF")**.

FATF does not itself constitute a sanctions list. Its publications are used as an important component of IconFX's jurisdictional and financial crime risk assessment.

This includes consideration of jurisdictions identified by FATF as:

- **High-Risk Jurisdictions subject to a Call for Action**; and
- **Jurisdictions under Increased Monitoring**.

IconFX may also consider country-risk information from regulators, governmental authorities, international organisations and other reliable compliance intelligence sources.

A customer's connection to a FATF-listed or otherwise higher-risk jurisdiction may result in:

- Enhanced Due Diligence;
- additional identity verification;
- additional source of funds verification;
- source of wealth verification;
- additional information regarding the purpose of transactions;
- enhanced transaction monitoring;
- Compliance or senior management review; and
- refusal or termination of the relationship where the associated risks cannot be appropriately managed.

A connection to a FATF-listed jurisdiction does not automatically imply wrongdoing. IconFX applies a risk-based approach and considers the overall circumstances of the customer and business relationship.

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8. Risk-Based Customer Assessment

IconFX assesses customers according to relevant money laundering, terrorist financing, proliferation financing, sanctions and wider financial crime risk factors.

Factors considered may include:

• country of residence;
• nationality;
• geographic exposure;
• occupation or business activity;
• PEP status;
• expected deposit and withdrawal behaviour;
• source of funds and source of wealth;
• ownership and corporate structures;
• payment methods;
• transaction patterns;
• sanctions exposure;
• adverse information;
• regulatory or law-enforcement information;
• the use of third parties; and
• any other information considered relevant to the customer relationship.

Customers presenting elevated risks may be subject to Enhanced Due Diligence and additional monitoring.

IconFX may decline to establish or continue a business relationship where the Company cannot adequately understand, verify or mitigate the associated risks.

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9. Enhanced Due Diligence

Enhanced Due Diligence may be applied where IconFX identifies an increased level of money laundering, terrorist financing, proliferation financing, sanctions, corruption or other financial crime risk.

EDD measures may include obtaining:

• additional identity information;
• additional address verification;
• detailed information regarding employment or business activities;
• source of funds evidence;
• source of wealth evidence;
• bank statements or other financial documentation;
• information concerning beneficial ownership;
• explanations or supporting evidence for particular transactions; and
• additional information regarding the intended nature of the customer relationship.

The Company may also subject higher-risk relationships to increased monitoring and more frequent periodic reviews.

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10. Transaction Monitoring

IconFX maintains procedures designed to identify transactions or patterns of activity which are unusual, inconsistent with the Company's knowledge of the customer or otherwise indicative of potential financial crime.

Examples of activity which may result in additional review include:

- transactions inconsistent with the customer's known profile;
- unexplained changes in deposit or withdrawal behaviour;
- unusual third-party payments;
- rapid movement of funds without an apparent economic purpose;
- attempts to disguise the origin or destination of funds;
- activity involving higher-risk jurisdictions;
- unusual cryptocurrency-related funding activity;
- multiple accounts or payment methods used without a clear reason;
- transactions inconsistent with stated source of funds; and
- attempts to circumvent the Company's verification, payment or compliance controls.

Where appropriate, IconFX may request additional information or documentation from the customer before allowing activity to continue.

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11. Deposits and Withdrawals

IconFX applies controls to deposits and withdrawals as part of its AML/CTF framework.

Where reasonably practicable and subject to applicable payment arrangements, withdrawals may be required to be returned to the original funding source or to an account held in the customer's own name.

The Company may request evidence confirming ownership of a bank account, payment method or digital asset wallet.

IconFX may reject, delay or investigate transactions involving unexplained third parties, mismatched account ownership or other circumstances which create financial crime concerns.

Customers may be required to provide additional information regarding the origin or destination of funds before a transaction is processed.

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12. Restricted and Higher-Risk Jurisdictions

IconFX does not provide services where doing so would breach applicable law, regulatory requirements, sanctions restrictions or the Company's internal risk appetite.

The Company maintains jurisdictional controls and may periodically amend the countries or territories from which it accepts customers.

Applications originating from, involving or otherwise connected to jurisdictions considered higher risk may be declined or subjected to Enhanced Due Diligence.

Customers must provide accurate information concerning their nationality, residence and location and must not attempt to circumvent geographical or jurisdictional restrictions.

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13. Ongoing Monitoring and Periodic Review

Customer Due Diligence is an ongoing process.

In addition to **daily AML, PEP and sanctions screening processes supported by IDWise**, IconFX periodically reviews customer information to ensure that its records remain accurate and that customer activity remains consistent with the Company's understanding of the relationship.

Customers may therefore be asked to provide updated:

- identification documents;
- proof of address;
- employment or business information;
- financial information;
- source of funds information;
- source of wealth information; or
- other documentation reasonably required for compliance purposes.

Customers are expected to promptly notify IconFX where material information supplied during onboarding changes.

The frequency and depth of periodic reviews may vary according to the customer's assessed risk level.

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14. Suspicious Activity

Where the Company identifies activity that may reasonably give rise to money laundering, terrorist financing, proliferation financing, sanctions evasion or other financial crime concerns, the matter will be escalated internally in accordance with the Company's procedures.

The Company's Compliance function will assess the information available and determine what further action is appropriate.

IconFX will make reports to the appropriate competent authorities where required under applicable law.

The Company, its employees and representatives will not disclose information concerning a suspicious activity report or investigation where such disclosure is prohibited by law.

IconFX may restrict account activity or delay transactions while conducting a compliance review where permitted or required by applicable law.

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15. Record Keeping

IconFX maintains records relating to:

- customer identification and verification;
- Customer Due Diligence;
- beneficial ownership;
- PEP and sanctions screening;
- AML screening results;
- risk assessments;
- source of funds and source of wealth information;
- transactions;
- compliance reviews and investigations;
- Enhanced Due Diligence; and
- regulatory or suspicious activity reporting.

Records are retained in accordance with applicable legal and regulatory requirements and are maintained securely with access restricted to authorised personnel where appropriate.

Such records may be made available to competent regulatory, supervisory, law-enforcement or other authorities where the Company is legally required to do so.

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16. Employee Training and Internal Controls

Relevant IconFX personnel receive AML/CTF, sanctions and financial crime awareness training appropriate to their roles and responsibilities.

The Company's internal framework includes procedures relating to:

- customer identification and verification;
- sanctions and PEP screening;
- use and review of IDWise screening results;
- transaction monitoring;
- identification of suspicious activity;
- internal escalation;
- record keeping;
- Enhanced Due Diligence; and
- regulatory reporting.

Employees are required to escalate potential financial crime concerns to the appropriate Compliance personnel.

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17. Refusal, Restriction or Termination of Business

IconFX reserves the right, subject to applicable laws and contractual requirements, to refuse, restrict, suspend or terminate a business relationship where:

- satisfactory KYC or due diligence cannot be completed;
- requested information or documentation is not provided;
- information provided appears false, misleading or inconsistent;
- the customer presents an unacceptable financial crime or sanctions risk;
- activity cannot reasonably be reconciled with the customer's known profile;
- a sanctions or other legal restriction applies;
- there are reasonable concerns regarding the source or destination of funds; or
- continuation of the relationship would expose the Company to unacceptable legal, regulatory, financial crime or reputational risk.

IconFX may not always be legally permitted to provide a customer with detailed reasons for a compliance-related restriction, investigation or termination.

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18. Customer Responsibilities

Customers are required to provide complete, accurate and up-to-date information to IconFX.

Customers must not use an IconFX account:

- on behalf of an undisclosed third party;
- to conceal the ownership or origin of funds;
- to facilitate unlawful activity;
- to circumvent sanctions or jurisdictional restrictions;
- to receive or transfer proceeds of crime; or
- for any purpose inconsistent with applicable law or the Company's terms and policies.

Customers must cooperate with reasonable requests for information made as part of IconFX's compliance procedures.

Failure to cooperate may result in restrictions being placed on the account or termination of the customer relationship.

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19. Governance and Review

Responsibility for the implementation and oversight of the Company's AML/CTF and sanctions framework rests with the Company's Board, Compliance function and other designated personnel in accordance with applicable regulatory requirements.

The Company maintains policies, procedures, systems and controls proportionate to the nature, scale and complexity of its business.

This Policy and the underlying AML/CTF procedures are reviewed periodically and may be updated to reflect:

- legislative or regulatory developments;
- changes to sanctions regimes;
- updates to FATF jurisdiction classifications;
- changes to the Company's products and services;
- changes to the Company's geographic exposure;
- emerging financial crime risks;
- changes to screening technologies or data sources; and
- changes to industry standards or regulatory guidance.

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20. Regulatory Information

MYFX GROUP LIMITED
Trading Name: IconFX
Incorporation Number: 8435863-1
Seychelles Securities Dealer Licence: SD202
Regulator: Financial Services Authority of Seychelles (FSA)
AML/KYC Technology Provider: IDWise – www.idwise.com

IconFX is committed to maintaining effective controls against money laundering, terrorist financing, proliferation financing, sanctions evasion and other forms of financial crime and to continually improving those controls as risks, technologies and regulatory requirements evolve.

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