

KYC / AML Policies

Global Whales Group is committed to upholding the highest standards of compliance in relation to Anti-Money Laundering (AML) and Counter-Terrorism Financing (CTF). The aim of the Company's Policy is to actively mitigate the risks of money laundering and terrorism financing. To support governmental efforts in combating the financing of terrorism and money laundering activities, the law requires all financial institutions to obtain, verify, and record information that identifies every individual who opens an account. We are legally obligated to report any client activity deemed suspicious and relevant to money laundering.

Money Laundering

Money laundering is the process of converting funds obtained through illegal activities (e.g., fraud, corruption, terrorism) into seemingly legitimate assets in order to conceal their true origin.

This process typically involves three stages:

- Placement – illicit funds are introduced into the financial system through instruments such as checks, bank deposits, or by purchasing high-value goods. Funds may be split into smaller deposits (a technique known as smurfing) to avoid detection.
- Layering – funds are transferred between various accounts or converted into different instruments to obscure their origin and ownership.
- Integration – the laundered funds are reintroduced into the economy as legitimate funds and used to acquire goods and services.

Commitment to AML

Global Whales Group is fully committed to preventing any action that facilitates the laundering of illegally obtained funds. This includes preventing the use of its services for the purposes of money laundering, terrorism financing, or other criminal conduct. To this end, the Company does not accept or make payments in cash under any circumstances. We reserve the right to suspend operations of any client suspected of engaging in illegal activities or money laundering.

Company Procedures

Global Whales Group verifies the identity and legal status of all clients. We follow all required measures under applicable laws and regulations issued by the relevant financial authorities. Our AML compliance measures within our FX operations include:

- Know Your Customer (KYC) policy and due diligence
- Ongoing monitoring of customer activity
- Recordkeeping and documentation

Know Your Customer

In accordance with our commitment to AML and KYC, all clients must complete a verification procedure. Before initiating any business relationship, the Company ensures satisfactory evidence is provided to verify the identity of the client or counterparty. Enhanced due diligence is applied to clients residing in high-risk jurisdictions or countries identified as lacking adequate AML standards, as well as to beneficial owners whose funds originate from those countries.

Individual Clients

During the registration process, clients must provide the following personal information: full name, date of birth, country of origin, and full residential address. The following documents are required for verification:

- Valid passport (with visible photo and signature); or
- Driver's license with photograph; or
- National identity card (front and back);
- Proof of current permanent address (e.g., utility bills, bank statements) not older than 3 months.

If the documents are in non-Latin characters, a notarized English translation must be provided.

Corporate Clients

If the applicant company is listed on a recognized or approved stock exchange, or is a wholly owned or controlled subsidiary, further identity verification may not be required. Otherwise, the following documents must be submitted:

- Certificate of incorporation or equivalent
- Memorandum and Articles of Association
- Certificate of good standing or proof of registered address
- Board resolution authorizing account opening and signatories
- Powers of attorney or authorizations
- Proof of identity for directors interacting with the Company
- Identity verification of the ultimate beneficial owners and any controlling parties

Monitoring Customer Activity

In addition to collecting information, the Company actively monitors customer transactions to detect suspicious activity. A suspicious transaction is any activity inconsistent with the customer's known business profile or

transaction history. Our monitoring systems include both automated and manual processes to prevent misuse of services by criminals.

Recordkeeping

The Company retains all records related to customer identity, transactions, and AML documentation (e.g., suspicious activity reports, monitoring logs) for at least 7 years following account closure.

Measures Taken

If the Company suspects a transaction to be linked to money laundering or other illegal activity, it will act in accordance with applicable laws and report such activity to the relevant authorities. We reserve the right to suspend or terminate any client relationship at our full discretion if there are grounds for suspicion.

For further information, please contact us at: support@whalescapitalfunding.com.

