

"ANTI-MONEY LAUNDERING (AML) AND KNOW YOUR CUSTOMER (KYC) POLICY

1. The AML and KYC Policy applies to www.marshallcapital.pro and its partners and clients (hereinafter the "Company") and aims to prevent and actively combat money laundering and any other activities facilitating money laundering or the financing of terrorist or criminal activities. The Company requires its management, employees, and branches to adhere to the principles of this Policy to prevent the use of its services for money laundering purposes.

2. Under this Policy, actions typically involve concealing or distorting the true origin of funds acquired through criminal means, with the intent to launder illegal proceeds.

3. Money laundering typically occurs in three stages. First, during the "placement" stage, cash is introduced into the financial system, where funds obtained from criminal activities are transformed into financial instruments, such as wire transfers, traveler's checks, or are deposited into financial institutions. In the "layering" stage, the funds are moved or transferred to other accounts or financial institutions to further distance the money from its criminal origin. During the "integration" stage, the funds are reintroduced into the economy and used to acquire assets, finance businesses, or support criminal activities. When financing terrorism, funds obtained from criminal activities may not necessarily be used; it is more likely an attempt to conceal the origin or intended use of funds that will be used for criminal purposes.

4. The client agrees to:

- Comply with legal norms, including international ones, aimed at combating illegal trade, financial manipulations, money laundering, and the legalization of unlawfully obtained funds.
- Refrain from directly or indirectly aiding illegal financial activities and any other illegal operations using the Website.

5. The client guarantees the legal origin, lawful possession, and the right to use the funds transferred to the Company's accounts.

In the case of suspicious or fraudulent deposits, including the use of stolen credit cards and/or any other fraudulent activities (including any chargebacks or payment reversals), the Company reserves the right to block your account, cancel any payouts made, and investigate the nature of such operations on the client's account, suspending such operations until the reasons for their occurrence are clarified and the investigation is completed.

6. During the investigation, the Company reserves the right to request copies of the client's identity documents and bank cards used for account funding, payment documents, and any other documents confirming the legal ownership and origin of funds.

The client is prohibited from using services and/or software for any illegal or fraudulent activities or for any illegal or fraudulent transactions (including money laundering) in accordance with the laws of the client's jurisdiction.

The Company's refusal to process suspicious transactions does not create grounds for the Company's civil liability for failure to perform obligations to the client.

7. Each division of the Company must adhere to an AML and KYC policy developed in accordance with local legislation.

8. All personal and official documentation will be kept for the minimum period established by local legislation.

9. All new employees must undergo mandatory AML and KYC training. Existing employees receive annual training. Additional training programs are mandatory for all employees involved in AML and KYC.

10. The Company reserves the right to request that the client confirm their registration information provided at the time of opening a trading account at its discretion and at any time. For verification purposes, the Company may request notarized copies of the client's passport, driver's license, or national identity card for identity confirmation, as well as bank statements or utility bills to confirm the residential address. In special cases, the Company may require the client to provide a photograph of themselves holding their identity document next to their face. Personal information in both documents must match.

11. If any of the client's registration data (full name, address, or phone number) changes, the client is obligated to promptly update the information in their personal profile on the Company's website or inform the Company's customer service department of such changes.

11.1. To change the phone number provided during registration of the client's profile, we require the client to provide documentation confirming their ownership of the new number (a contract with the

mobile service provider) and a photograph of the identity document held by the client next to their face. The client's personal information in both documents must match.

12. The client is responsible for the authenticity of the documents (their copies) and acknowledges the Company's right to contact the relevant authorities of the issuing country to confirm their authenticity."