

PALMA ST

AML Policy

1. AML Policy

Palma Street is the trade name of PLM Global Markets (hereinafter referred to as the 'Company'), aims to detect, manage, and mitigate the risks associated with money laundering and the financing of terrorism. The Company has introduced strict policy aimed on the detection, risk prevention or mitigation in respect of any suspicious activities performed by customers. The Company is required to constantly monitor its level of exposure to the risk of money laundering and the financing of terrorism. The Company believes that if it knows its client well and understands its instructions thoroughly, it will be better placed to assess risks and spot suspicious activities.

PALMA STREET is committed to follow best practices and market standards in areas of accountability, transparency, and business ethics in order to promote sustainability.

2. KYC Policy

Effective Customer Due Diligence (CDD) measures are essential to the management of money laundering and terrorist financing risk. CDD means identifying the customer and verifying their true identity on the basis of documents, data or information both at the moment of starting a business relationship with customer and on an ongoing basis. The customer identification and verification procedures require, first, the collection of data and, second, attempts to verify that data.

1.1 Client Due Diligence

What is Client Due Diligence ("CDD")?

CDD is the process that financial service providers must follow in order to:

- a. Be reasonably satisfied that their Clients are the persons that they claim to be;
- b. Know whether they are acting on behalf of another person;
- c. Ascertain that there is no legal barrier (e.g. sanctions) to providing them with the services required;
- d. Be aware of the Clients' business to assess the extent to which their transactions and activities undertaken with the Company is consistent; and
- e. To enable the Company to assist law enforcement agencies, by providing available information on Client or activities being investigated.

CDD measures consist of:

- a. Identifying the Client and verifying his or her identity.
- b. Identifying the Ultimate Beneficial Owner ("UBO") and verifying his or her identity.
- c. Obtaining information on the Purpose and Intended nature of business relationship.

To identify the UBO, different rules will apply to different legal forms and this will be detailed in the following sections.

1.2 'Know Your Customer'

The foundation of any effective system to combat money laundering and the financing of terrorism is the 'Know Your Customer' (KYC) Principle. It is the degree of proximity between PALMA STREET and the Client, which the KYC principle attempts to establish, that will allow the Company to gauge and decide whether a transaction is suspicious and be able to establish, avert and effectively identify and mitigate (and report) risks, in particular risks of money laundering and the financing of terrorism.

During the registration process an individual customers provide the following identification information to the Company:

FOR NATURAL PERSONS:

- Full name
- Date of birth
- Nationality
- Current permanent address,
- Origin of funds
- Occupation
- Name of employer

FOR LEGAL ENTITIES:

- Company Name
- Registration/Incorporation number and date
- Country of registration/incorporation
- Registered address
- Shareholders and beneficiaries, their names, registration numbers, addresses,

In order to verify the abovementioned information will require submitting the following documents:

FOR NATURAL PERSONS:

Identity:

- i. Copy of passport or National Identity Card or a valid driving license with a photograph;

Current and permanent residential address:

- ii. Copy of a utility bill (not more than 3 months old);
 - recent utility bill (gas, water, electricity or landline telephone); or
 - recent bank or credit card statement; or

- recent reference or letter of introduction from

FOR LEGAL ENTITIES:

- Certificate of Incorporation
- Memorandum and Articles of Association and statutory statement
- Certificate of good standing or other proof of registered address of the company;
- Resolution of the board of directors to open an account and confer authority on those who will operate the account
- Copies of powers of attorney or other authorities given by the directors in relation to the company;
- Proof of identity of all directors
- Proof of identity of all beneficial owner(s)

3. Transaction Monitoring

Palma Street aims to ensure the integrity of any sensitive data it obtains, such as your account information and the transactions you make, using a variety of security measures and fraud controls. Any fraudulent activity will be documented and all related accounts to it will be immediately closed. All funds in these accounts will be forfeited.

Palma Street has the right to request at any given time the following documents:

- Copies of your credit cards, used to make the deposit (Front side with only the 4 last digits visible, back side with the CVV covered).
- Bank statement of the card used to make the deposit
- Declaration deposit form