PRIME DESK

MULTI-ASSET INSTITUTIONAL-GRADE BROKERAGE

AML & KYC Policy

Anti-Money Laundering, Counter-Terrorist Financing
and Know Your Client Standards

Company Registration Number 2026-00429
Saint Lucia International Business Company
Version 1.0 · Reference PD·LEG·09

1 — Purpose and Standard

1.1 The Company's Position

Prime Desk Ltd. does not accept, hold, or move funds connected with money laundering, terrorist financing, sanctions evasion, fraud, or any other criminal activity. This Policy sets out the framework applied to prevent that, and it applies to every client, account, partner, and transaction without exception.

1.2 Standard Applied

The Company applies the laws of Saint Lucia together with the **Financial Action Task Force (FATF) Recommendations** and the substance of the anti-money-laundering standards applied in major regulated jurisdictions. That standard is adopted voluntarily where it exceeds local requirement, because the Company operates internationally and its counterparties — liquidity providers, banks, and payment providers — apply it.

NON-NEGOTIABLE

No commercial consideration overrides this Policy. An account is not opened, a deposit is not accepted, and a withdrawal is not processed where doing so would breach it — regardless of the size of the account, the relationship, or the partner who introduced it.

2 — The Framework

PILLAR	WHAT IT COVERS
Client due diligence	Identification and verification of every client and beneficial owner before an account is activated.
Risk assessment	Assignment of a risk rating to every client and the application of measures proportionate to it.
Screening	Sanctions, politically exposed person, and adverse media screening at onboarding and on an ongoing basis.
Transaction monitoring	Automated and manual monitoring of deposits, withdrawals, and trading for indicators of financial crime.
Reporting	Internal escalation and, where required, external reporting of suspicious activity.
Record keeping	Retention of identification, transaction, and screening records for not less than five (5) years.
Training and governance	Role-appropriate training, independent compliance authority, and Board oversight.

2.1 The Compliance Function

The **Chief Compliance Officer** owns this Policy, reports to the Board as well as to the Chief Executive, and holds independent authority to refuse an account, freeze an account, block a transaction, or halt an activity. That authority may not be overruled by the commercial functions of the business.

3 — Client Due Diligence

3.1 No Account Without Verification

An account is not activated, and no trading is permitted, until identification and verification are complete. The Company does not open anonymous accounts, numbered accounts, or accounts in a false name, and does not accept a client it cannot identify.

3.2 Individual Clients

REQUIREMENT	ACCEPTED EVIDENCE
Identity	Valid government-issued photographic identity document — passport, national identity card, or driving licence — clear, unexpired, and showing full name, date of birth, and document number.
Address	Utility bill, bank statement, or government correspondence dated within the last three (3) months, showing name and residential address.
Source of funds	Evidence of where the funds being deposited came from — salary, business income, sale of an asset, inheritance, or investment proceeds.
Source of wealth	For higher-risk clients and larger accounts, evidence of how the client's overall wealth was accumulated.
Liveness	Where required, a selfie or video check confirming that the applicant is the person shown on the document.

3.3 Corporate Clients

In addition to the above for each authorised representative: certificate of incorporation; memorandum and articles of association; register of directors and of shareholders; proof of registered and operating address; board resolution authorising the account; and identification of every **beneficial owner holding 25% or more**, together with identification of the natural persons exercising control where no individual reaches that threshold.

3.4 Third Parties

The Company accepts deposits only from an account held in the client's own name and pays withdrawals only to the same. Third-party funding is refused and returned to source. Accounts operated by a power of attorney require identification of both the client and the attorney, and the instrument itself.

3.5 Ongoing Due Diligence

Documentation is reviewed periodically and refreshed at least every **twelve (12) months** for higher-risk clients and on any material change — a change of address or name, an unexplained change in trading behaviour, or a change in beneficial ownership. Failure to provide requested documentation may result in restriction or closure of the account.

4 — Risk-Based Approach

Every client is assigned a risk rating at onboarding and reassessed on review. The rating determines the depth of diligence, the frequency of review, and the sensitivity of transaction monitoring.

RATING	INDICATIVE PROFILE	MEASURES APPLIED
Standard	Verified individual in a low-risk jurisdiction, salaried or business income, transparent source of funds, trading consistent with stated profile.	Standard due diligence; periodic review.
Elevated	Higher deposit volumes, jurisdictions with weaker controls, complex ownership, or an activity profile that does not match the stated one.	Additional documentation; closer monitoring; review at least annually.
High	Politically exposed persons and their close associates and family members; adverse media matches; cash-intensive businesses; unexplained wealth.	Enhanced due diligence; source of wealth evidence; senior management approval to open and to continue; review at least every twelve months.

4.1 Prohibited Relationships

a) Any person or entity subject to sanctions imposed by the United Nations, the United States, the European Union, or the United Kingdom, or owned or controlled by such a person.

b) Shell banks, and any institution known to permit its accounts to be used by a shell bank.

c) Applicants who refuse to provide, or cannot provide, the documentation required by this Policy.

d) Applicants whose source of funds cannot be established to the Company's satisfaction.

e) Residents of jurisdictions in which the Company does not offer services — currently the United States, Türkiye, the United Arab Emirates, India, and Saint Lucia.

5 — Screening

At onboarding	Every applicant, beneficial owner, and authorised representative is screened against sanctions lists, PEP databases, and adverse media before the account is activated.
Ongoing	The client base is re-screened on a continuing basis and whenever a relevant list is updated, so that a person who becomes designated after onboarding is identified.
On a match	The account is frozen immediately pending review. A confirmed sanctions match results in immediate termination, blocking of funds as required, and reporting.
Payments	Payment instructions are screened for sanctioned banks, intermediaries, and jurisdictions before funds are released.

6 — Transaction Monitoring

Deposits, withdrawals, and trading are monitored automatically and by review. The following are among the indicators that generate an alert.

a) Deposits followed by withdrawal with little or no trading in between.

b) Funding inconsistent with the client's stated income, occupation, or source of wealth.

c) Structuring — multiple deposits below a threshold that together exceed it.

d) Use of multiple payment methods or accounts without a commercial explanation.

e) Requests to pay a withdrawal to a different name, account, or jurisdiction from the deposit.

f) Offsetting or mirrored positions across accounts producing no net market risk.

g) Connections between nominally unrelated accounts — shared device, address, or payment instrument.

An alert is reviewed by compliance. The account may be restricted while the review is carried out.

7 — Suspicious Activity and Tipping Off

Any member of staff who suspects that a transaction or client is connected with financial crime must report it internally to the Chief Compliance Officer immediately, without exception and without regard to the value of the relationship. Where suspicion is confirmed, a report is made to the relevant authority in accordance with applicable law.

TIPPING OFF

No member of staff may inform a client, a partner, or any other person that a report has been made or that an investigation is under way. Doing so is a serious offence in most jurisdictions and, within the Company, is grounds for immediate dismissal. Where an account is restricted for this reason, staff will not be able to explain the reason to the client.

8 — Records, Training and Governance

Records	Identification documents, verification results, screening results, transaction records, alerts, and internal reports are retained for not less than five (5) years from the end of the relationship.
Training	All staff receive AML and CFT training on appointment and at least annually, with additional training for client-facing, payments, and dealing roles.
Independent review	The framework is reviewed at least annually, independently of the compliance function where practicable.
Board reporting	Alert volumes, escalations, internal reports, and framework changes are reported to the Board at least quarterly.
Partners	Introducing brokers are subject to due diligence before appointment, must not accept client funds, and must not represent that they can shorten verification.

A public summary of the Company's internal framework. Operational thresholds and monitoring parameters are confidential. · compliance@prime-desk.com · Prime Desk Ltd., Rodney Court Building, Rodney Bay, Gros Islet, Saint Lucia LC01 401