

ANTI-MONEY LAUNDERING (AML), COUNTER-TERRORISM FINANCING (CFT), AND KNOW YOUR CUSTOMER (KYC) POLICY

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AT BRIGHT FIN GLOBAL (“WE”, “US”, OR “OUR”), WE ARE COMMITTED TO PREVENTING MONEY LAUNDERING, THE FINANCING OF TERRORISM, AND OTHER ILLICIT ACTIVITIES. WE MAINTAIN A STRICT ANTI-MONEY LAUNDERING (AML), COUNTER-TERRORISM FINANCING (CFT), AND KNOW YOUR CUSTOMER (KYC) POLICY TO ENSURE COMPLIANCE WITH ALL APPLICABLE LAWS, REGULATIONS, AND INDUSTRY BEST PRACTICES.

THIS POLICY OUTLINES THE STEPS WE TAKE TO PREVENT OUR SERVICES FROM BEING USED FOR ILLEGAL PURPOSES AND TO ENSURE THE SAFETY AND SECURITY OF OUR PLATFORM AND ITS USERS.



1. Introduction

Bright Fin Global, as a cryptocurrency trading platform, is obligated to implement AML and CFT measures as required by international and local laws. These measures include customer identity verification, monitoring of transactions, and the reporting of suspicious activities to the appropriate authorities. We also comply with KYC regulations to verify the identity of our users and understand their activities.

Our AML, CFT, and KYC policies are designed to:

- Prevent money laundering and the financing of terrorism.
- Ensure the integrity and security of our platform.
- Protect our users and stakeholders from fraud, financial crime, and illicit activities.
- Comply with local and international regulatory requirements, including the Financial Action Task Force (FATF) guidelines.

2. Customer Identification Program (KYC)

As part of our commitment to preventing financial crimes, we implement a Customer Identification Program (CIP) to verify the identity of all users before allowing them to access our services. This process is a fundamental part of our KYC policy.

- **Identity Verification:** We require users to provide accurate and up-to-date information, including full name, date of birth, address, government-issued identification (e.g, passport, driver's license, national ID), and a selfie or proof of residence when necessary.
- **Risk-Based Approach:** Bright Fin Global conducts customer risk assessments during the KYC process. The level of due diligence applied will vary depending on the type of user, the jurisdiction in which the user resides, and the transaction history or volume.



- **Ongoing Monitoring:** After the initial KYC verification, we continuously monitor accounts for suspicious activity. This includes reviewing high-value transactions, unusual patterns, or transactions originating from high-risk jurisdictions.
- **Enhanced Due Diligence (EDD):** For high-risk customers, such as politically exposed persons (PEPs), individuals from high-risk countries, or those with complex transaction patterns, we may apply enhanced due diligence measures to verify the source of funds and the legitimacy of transactions.

3. Anti-Money Laundering (AML) Policy

Bright Fin Global is committed to implementing effective anti-money laundering procedures to detect and prevent money laundering activities.

Our AML procedures include the following:

- **Transaction Monitoring:** We use automated tools to monitor all transactions conducted on our platform. Transactions are screened for signs of money laundering, such as structuring (splitting transactions to avoid detection), rapid transfers, or transfers to/from high-risk jurisdictions.
- **Suspicious Activity Reporting:** If we identify suspicious activity, such as unusual trading patterns or the use of our platform for illicit activities, we are obligated to file a Suspicious Activity Report (SAR) with the appropriate financial authorities.
- **Funds Origin and Destination Review:** We ensure that the source and destination of funds are legitimate by scrutinizing transaction history and cross-referencing with users' profiles.
- **Prohibited Transactions:** We actively prohibit transactions related to illegal activities, including the purchase or sale of goods and services that violate laws, such as illicit drugs, weapons, and human trafficking. We also block transactions with sanctioned entities, individuals, and countries as outlined by international sanctions regimes (e.g., the United Nations, European Union, U.S. Office of Foreign Assets Control (OFAC)).



4. Counter-Terrorism Financing (CFT) Policy

Bright Fin Global has a dedicated policy to detect and prevent the financing of terrorism. Our CFT measures are designed to ensure that our platform is not used to support criminal activities or terrorist organizations.

- **Screening Against Terrorist Lists:** We screen all users and transactions against global lists of individuals and entities suspected of being involved in terrorism, including those published by the United Nations, OFAC, and other relevant authorities.
- **Reporting Suspicious Transactions:** If we identify a potential link to terrorist financing through suspicious activities, we will report these to the relevant authorities and may take actions such as freezing or blocking the user's account.
- **Cooperation with Authorities:** We cooperate fully with law enforcement and regulatory authorities in investigating and prosecuting acts of terrorism and related financial crimes.

5. Risk-Based Approach to AML, CFT, and KYC

We apply a risk-based approach to our AML, CFT, and KYC processes. This means that the level of scrutiny we apply to a particular user or transaction is based on the level of risk posed by the user or activity.

- **Low-Risk Users:** For low-risk users, the standard KYC verification process will be applied, and regular monitoring will be conducted.
- **High-Risk Users:** For high-risk users, such as those from high-risk jurisdictions, PEPs, or those engaging in high-volume transactions, we will apply enhanced due diligence (EDD) measures, which may include additional verification of identity, source of funds, and purpose of transactions.



- **Risk Classification:** We classify users based on factors such as location, nature of transactions, frequency of trading, and historical behavior. This helps us to apply appropriate levels of scrutiny and identify unusual or suspicious behavior.

6. User Obligations

As part of our efforts to prevent illicit activities, we require users to:

- **Provide Accurate Information:** Ensure that all information provided during registration and throughout the verification process is complete, accurate, and up-to-date.
- **Report Suspicious Activity:** Immediately report any suspicious transactions, activities, or behaviors to our support team.
- **Comply with Requests for Documentation:** Respond promptly to any requests from Bright Fin Global for additional documents or information to comply with our AML, CFT, and KYC obligations.
- **Notify of Changes in Information:** Users must notify Bright Fin Global of any changes to their personal information, including address, nationality, or occupation, to ensure that their account information remains current.

7. Record-Keeping and Documentation

Bright Fin Global is required to maintain records of customer identification and transaction data for a minimum period in accordance with applicable AML and KYC regulations.

- **Transaction Records:** We keep detailed records of all transactions, including the date, amount, parties involved, and any other relevant information.
- **Identification Records:** We retain records of user identification documents for as long as the customer maintains an account with us and for a period following account closure, as required by law.



8. Sanctions and Politically Exposed Persons (PEPs)

In compliance with international sanctions and regulations, Bright Fin Global does not allow transactions with or provide services to individuals or entities on sanctions lists, as well as PEPs and their families or close associates, without undergoing enhanced due diligence.

- **Sanctions Screening:** We screen all users and transactions against global sanctions lists to ensure compliance with international sanctions regimes. This helps prevent the use of our platform for illegal or unethical purposes.
- **PEP Identification:** As part of the KYC process, we identify whether a user is a PEP or related to a PEP. Enhanced due diligence procedures will apply to PEPs to assess the source of funds and ensure that the funds are not derived from illicit activities.

9. Training and Awareness

We provide ongoing training to all employees and affiliates to ensure they are aware of the requirements of our AML, CFT, and KYC policies. This helps ensure that we remain vigilant in identifying and preventing financial crimes.

10. Cooperation with Authorities

We cooperate with relevant law enforcement and regulatory authorities to ensure full compliance with AML, CFT, and KYC regulations. This includes providing requested documents and information to authorized regulators and law enforcement agencies in accordance with applicable laws.



11. Updates to the AML, CFT, and KYC Policy

We review and update our AML, CFT, and KYC policies periodically to reflect changes in regulatory requirements and industry best practices. Any updates will be posted on our website, and users will be notified

- accordingly.

12. Contact Us

If you have any questions or concerns regarding our AML, CFT, and KYC policies or need assistance with compliance matters, please contact us at:

Bright Fin Global
Email: compliance@brightfinglobal.com

By using the services of Bright Fin Global, you acknowledge and agree to comply with all AML, CFT, and KYC regulations as outlined in this policy.

