



AML Policy



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1. Introduction

1.1. Exeprime Ltd (hereinafter referred to as the "Company," "Exeprime," "us," "we," or "our"), is a legal entity incorporated under the laws of Saint Lucia, with its registered office located at Ground Floor, The Sotheby Building, Rodney Village, Rodney Bay, Gros-Islet, Saint Lucia. The Company holds Registration Number 2023-00182. The Company operates under the name "Exeprime" and is engaged in offering financial services in accordance with applicable regulations.

1.2. Exeprime Ltd is fully committed to preventing money laundering and financing of terrorism within the scope of its services and operations. In adherence to applicable legal and regulatory requirements, the Company has established comprehensive compliance procedures designed to detect, prevent, and report any suspicious activities. These measures are continuously reviewed and updated to ensure that Exeprime Ltd operates in full compliance with relevant anti-money laundering (AML) regulations and best industry practices.

2. Money Laundering Process

"Money laundering" refers to the illegal process of disguising the origins of funds acquired through criminal activities, such as fraud, corruption, terrorism, organized crime, or other illicit conduct, in order to make them appear as if they originate from legitimate sources. The money laundering process is typically divided into three distinct stages:

- Placement.

The "placement" stage marks the initial introduction of funds derived from illicit activities into the financial system. This phase is crucial because it is the point at which these funds are most vulnerable to detection, as the proceeds from illegal activities are being funneled into legitimate financial channels. Consequently, it is a critical stage for

identifying and preventing illegal transactions.

- **Layering.**

In the "layering" stage, money launderers engage in a series of complex transactions designed to obscure the true source of illicit funds. This is achieved by altering both the form and location of the funds, making it more difficult for law enforcement and regulatory bodies to trace their origin. Techniques used in the layering process include multiple transfers across various financial institutions, the creation of false letters of credit (L/Cs), and the use of fabricated invoices and bills of lading. These methods serve to disrupt the audit trail, provide a shield of anonymity, and further complicate the detection of illegal activity..

- **Integration.**

At the "integration" stage, the laundered funds are reintroduced into the economy, making them appear as though they originate from legitimate sources. This stage involves integrating the illicit money back into the financial system through various investments, purchases, or other financial activities that allow the funds to blend seamlessly with legal capital. The objective is to provide the appearance of legitimacy to the funds, enabling the launderer to use the proceeds without raising suspicion or attracting regulatory scrutiny.

3. AML Procedures

3.1 The Company enforces a rigorous anti-money laundering policy designed to identify individuals engaged in illicit activities, ensuring compliance with legal standards. This approach aims to minimize any procedural complications for legitimate clients while safeguarding the Company and the financial system from misuse. By adhering to strict identification protocols, Exeprime strives to detect and prevent illegal activities, ensuring that only lawful and genuine customers are served, in accordance with regulatory requirements.

3.2 In adherence to stringent compliance protocols, the Company ensures comprehensive coverage across the following areas:

a. Verification of clients' identities in accordance with the Know Your Customer (KYC) policy, alongside the implementation of thorough Customer Due Diligence (CDD) procedures, to ensure compliance with regulatory standards.

b. Maintaining detailed records of all financial transactions associated with the client, to facilitate any required investigations and to ensure the integrity and continuity of transaction history in compliance with regulatory requirements.

c. Reporting of Suspicious Transactions: Any attempt to misuse Exeprime's services may result in criminal prosecution. Exeprime is obligated to report such activities to the relevant authorities immediately, in accordance with applicable laws and regulations.

3.3 To prevent money laundering and other illicit activities, Exeprime strictly prohibits the use of cash for any transactions, whether they involve deposits or withdrawals. This policy is in place to ensure the integrity and security of our financial operations and to comply with applicable legal and regulatory requirements.

3.4 Exeprime reserves the right to suspend or refuse the processing of any transaction at any stage if there are reasonable grounds to believe that the transaction is connected to money laundering, criminal activity, or third-party funding. This measure is in place to protect the integrity of the Company's operations and ensure compliance with all relevant legal and regulatory obligations.

3.5 In accordance with international law and regulatory requirements, Exeprime is not obligated to notify the Client if it reports suspicious activity to the relevant authorities or regulatory bodies. This provision ensures that the Company can comply with legal obligations without disclosing such actions to the Client, in order to maintain the integrity of any investigations or actions taken.

4. Compliance Officer

4.1 The Compliance Officer (CO) of Exeprime serves as the central authority responsible for overseeing all aspects of the Company's efforts in preventing and detecting money laundering activities. The CO ensures that all policies, procedures, and regulations designed to combat money laundering are properly implemented and maintained across the Company's operations.

- (a) The Compliance Officer (CO) is tasked with providing support and guidance to Exeprime's personnel to ensure that all money-laundering risks are effectively managed and mitigated. The CO works closely with staff to reinforce compliance procedures, promote awareness of potential risks, and ensure that all regulatory requirements are met to maintain the integrity of the Company's operations.
- (b) The Compliance Officer (CO) is responsible for the ongoing development and periodic review of Exeprime's Anti-Money Laundering (AML) compliance framework, including this Policy, to ensure that it remains effective, up-to-date, and in full alignment with applicable statutory and regulatory requirements. The CO ensures that the framework adapts to any changes in regulations, laws, or emerging risks, maintaining Exeprime's commitment to preventing money laundering and other illicit financial activities.
- (c) The Compliance Officer (CO) is committed to providing regular training and updates to its employees regarding enhancements to Anti-Money Laundering (AML) procedures, ensuring that they are equipped with the knowledge necessary to comply with evolving international laws and regulations. This training will be conducted periodically and will focus on any required changes to AML protocols, empowering employees to recognize and address potential risks, and ensuring that Exeprime's AML policies remain robust and effective in combating money laundering and related illegal activities.
- (d) The Compliance Officer (CO) reserves the right to take any additional necessary actions, not explicitly outlined in this policy, to prevent, detect, and respond to any activity related to money laundering (AML). This may

include implementing further safeguards, conducting enhanced due diligence, or cooperating with relevant authorities to ensure full compliance with applicable laws and regulations, and to maintain the integrity of the financial system. The Company will continuously assess and adapt its practices to address emerging risks and to proactively prevent any form of illicit financial activity.

4.2 Exeprime shall designate a Money Laundering Reporting Officer (MLRO), who will act as the primary point of contact for any Company employee who becomes aware of or suspects money laundering transactions or activities. The MLRO will be responsible for overseeing the reporting and handling of such matters and ensuring compliance with all relevant legal requirements. The MLRO's duties include:

- Reviewing and evaluating any suspicions or concerns raised by employees regarding potential money laundering activities.
- Reporting suspicious transactions to the appropriate regulatory authorities as required by law.
- Ensuring that the Company's internal procedures for detecting and preventing money laundering are consistently followed and updated.
- Providing guidance and support to Company personnel on matters related to money laundering prevention.

(a) The Money Laundering Reporting Officer (MLRO) at Exeprime is responsible for thoroughly reviewing all internal reports related to money laundering (ML) and terrorist financing (TF), as well as assessing all relevant available information to determine if there is sufficient evidence suggesting potential involvement in such activities. This process involves a detailed evaluation of the provided data and any other pertinent information that could indicate suspicious or unlawful financial activity. If necessary, the MLRO will take the appropriate steps to report such findings to the relevant authorities.

5. Third-party transactions

Third-party transactions are strictly prohibited. If any third-party transaction is identified, the Company will return the funds to the original beneficiary.

"Third-party transactions" are defined as any transactions in which Exeprime receives funds from or is requested to transfer funds to an individual or entity other than the account holder, beneficiary, or partner, on whom Exeprime has completed its required due diligence.

For example

- (a) A beneficiary or partner, to whom Exeprime has agreed to provide funds, requests that the Company remit those funds to a third party, rather than to the original beneficiary or partner.
- (b) The Company receives funds from a third party, unexpectedly, instead of directly from the Account holder.

6. Employees AML training

6.1 The Company shall ensure that Anti-Money Laundering (AML) training is provided to its employees, with particular emphasis on those employees who engage directly with account holders or beneficiaries.

- (a) As promptly as possible after the commencement of their employment or engagement with the Company.
- (b) On a regular basis, at a minimum of once per year, to ensure that employees remain fully aware of the risks associated with money laundering and terrorist financing.

6.2 Each employee shall be provided with a copy of this policy promptly upon the commencement of their employment, as well as whenever the policy is updated. Employees are required to confirm in writing that they have read, understood, and agree to comply with the updated policy.

Compliance Officer for Exeprime:

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