

ANTI-MONEY LAUNDERING (AML) POLICY

ZEVEN GLOBAL SRL

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1. Introduction

Zeven Global SRL ("Zeven Global," "the Company," "we," "our") is committed to the fight against money laundering (AML) and the financing of terrorism (CFT). In order to comply with local and international laws and regulations, we implement policies and procedures to prevent our services from being used for illegal activities, including money laundering, terrorist financing, and other financial crimes.

This **Anti-Money Laundering (AML) Policy** aims to establish the principles, procedures, and controls necessary to ensure that Zeven Global complies with AML and CFT obligations, protecting both the Company and our clients from being involved in illegal activities.

2. Purpose and Scope

2.1. The purpose of this policy is to prevent the use of Zeven Global's services for money laundering, terrorist financing, or other criminal activities, by implementing internal control measures, monitoring, and compliance with national and international regulations.

2.2. This policy applies to all clients, employees, agents, and any other parties interacting with Zeven Global. It also covers all the Company's products and services, including trading platforms, payment services, and any related operations.

3. Regulatory Requirements

3.1. Zeven Global adheres to local and international AML/CFT regulations, such as the **Anti-Money Laundering and Terrorist Financing Prevention Law** of Costa Rica, and international standards established by bodies such as the **FATF (Financial Action Task Force)**, **EU Anti-Money Laundering Directive**, and other applicable laws and regulations.

3.2. These regulations require Zeven Global to implement an effective anti-money laundering program, which includes procedures for client identification and verification, transaction monitoring, and the detection and reporting of suspicious activities.

4. Know Your Customer (KYC) Policy

4.1. Zeven Global implements a **Know Your Customer (KYC)** process to ensure that all our clients are properly identified and their identities verified before being allowed to access our services. This process includes the collection of identification documents and proof of address as appropriate, before allowing a client to make transactions on our platform.

4.2. The KYC process will be carried out during **account opening** and on a continuous basis, especially if there are significant changes in account activity or if there are indications that the information provided is false or incomplete.

4.3. KYC Verification Requirements:

- **Identification:** Copies of valid identification documents such as passport, ID card, or driver's license.
- **Proof of Address:** Documents such as utility bills, bank statements, or rental agreements showing the client's current address.
- **Source of Funds:** Additional documentation to verify the source of funds, especially for clients making significant deposits or withdrawals.

5. Monitoring and Reporting of Suspicious Activities

5.1. Zeven Global continuously monitors all transactions and activities of our clients to detect any suspicious or unusual activity that may be related to money laundering or terrorist financing.

5.2. Any transaction or behavior that is inconsistent with the client's risk profile, their usual business activities, or is otherwise abnormal, will be evaluated and, if necessary, reported to the relevant authorities. Examples include, but are not limited to:

- Unusually large or frequent transactions that have no legitimate business justification.
- Use of third-party bank accounts or making deposits from accounts not in the client's name.
- Attempts to conceal the origin of funds through complex or unusual transactions.

5.3. Suspicious activities will be reported **to the relevant regulatory authorities** and competent authorities in accordance with local and international AML/CFT laws.

6. Fraud and Market Manipulation Prevention

6.1. Zeven Global prohibits price manipulation, insider trading, and any other form of financial fraud. This includes practices such as:

- **Fraudulent Registration:** Using false, incomplete, or stolen data or creating multiple accounts to bypass restrictions or abuse promotions.
- **Bonus Abuse:** Attempting to withdraw promotional funds without meeting volume requirements, or using strategies such as hedging between accounts to exploit bonuses.
- **Arbitrage:** Exploiting technical errors, latencies, or price discrepancies between platforms, either manually or through automated software.
- **Abusive Hedging:** Opening opposite positions in own or third-party accounts to guarantee profits with no real risk.
- **Extreme Scalping or Sniping:** Rapid trades during high volatility events or with outdated prices to gain unfair profits.
- **Gap Trading:** Using price gaps between market closes and openings to obtain profits not anticipated by the Company.
- **Unauthorized Software:** Using bots, algorithms, or programs that interfere with the platform, manipulate prices, or violate our policies.
- **Money Laundering:** Rapid deposits and withdrawals with no significant activity or using funds of illicit or unverifiable origin.
- **Payment Method Fraud:** Using stolen cards, third-party accounts, or requesting fraudulent chargebacks after withdrawals.

6.2. Zeven Global employs **transaction monitoring systems** to detect these activities and take immediate action, including **account suspension**, **fund blocking**, and **reporting to authorities**.

7. Money Laundering and Terrorist Financing Prevention

7.1. Zeven Global applies measures to prevent money laundering and terrorist financing, including the following:

- **Client Identification and Verification (KYC):** Before accepting any deposit or allowing transactions, we verify the identity and origin of funds of the client.
- **Continuous Monitoring:** We closely monitor client activities to detect suspicious patterns that may be related to money laundering or terrorist financing.
- **Suspension of Suspicious Transactions:** Any transaction that does not meet KYC/AML requirements will be blocked until resolved.

7.2. If suspicious activities related to money laundering or terrorist financing are detected, Zeven Global will take the following actions:

- **Account Suspension:** The client's account will be suspended while the suspicious transaction or activity is under investigation.
- **Reporting to Authorities:** The relevant authorities will be notified, and all relevant information will be provided.

8. Training and Awareness

8.1. Zeven Global provides regular training to its employees and agents on KYC/AML compliance and best international practices. This training includes identifying suspicious activities, managing high-risk client profiles, and methods to prevent money laundering.

8.2. All employees involved in client verification and transaction monitoring must be properly trained on anti-money laundering procedures and compliance with local and international laws.

9. Responsibility and Compliance

9.1. The responsibility to comply with this AML Policy lies with **Zeven Global** and its employees. Failure to adhere to KYC/AML regulations or involvement in suspicious activities will result in internal sanctions, which may include account suspension or closure, as well as notification to the relevant authorities.

9.2. Zeven Global will implement disciplinary measures to ensure that all employees, agents, and affiliates comply with our anti-money laundering and terrorist financing policies.

10. Modifications to the Policy

Zeven Global reserves the right to modify this **Anti-Money Laundering (AML)** Policy at any time to comply with local and international laws and regulations. Any changes will be notified to our clients and made available on our website.

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Effective Date: May 2025