ANTI-MONEY LAUNDERING (“AML”) AND KNOW YOUR CUSTOMER (“KYC”) POLICY STATEMENT

September 2026

INVIDIATRADE LTD (trading as **“INVIDIATRADE”**) is committed to the highest standards of integrity, transparency, and regulatory compliance. This combined AML/KYC Policy describes the measures, controls, and procedures we apply to prevent money laundering, terrorist financing, and other illicit financial activities, and to verify and monitor all client relationships in accordance with Saint Lucia’s legal framework.

1. PURPOSE AND SCOPE

This Policy applies to every prospective and existing client of INVIDIATRADE. Its purpose is to ensure that INVIDIATRADE’s products and services are not used to launder money, finance terrorism, or facilitate other financial crimes. To achieve this, we identify and verify the true identity of all clients and perform ongoing, risk-based monitoring of client relationships and transactions.

2. REGULATORY FRAMEWORK

2.1 INVIDIATRADE LTD complies with Saint Lucia’s Money Laundering (Prevention) Act, the Proceeds of Crime Act, and related statutes – including their recent amendments – governing anti-money laundering (“*AML*”), counter–terrorist financing (“*CFT*”), and proceeds-of-crime forfeiture mechanisms. These laws define money laundering offenses, establish customer due diligence (“*CDD*”) obligations, suspicious transaction reporting requirements, record-keeping mandates, and enhanced scrutiny for high-risk customers such as politically exposed persons.

2.2 We further adhere to the guidelines and supervision of the Financial Intelligence Authority (“*FIA*”) – Saint Lucia’s Financial Intelligence Unit – as well as the Financial Services Regulatory Authority (“*FSRA*”) and the Eastern Caribbean

Central Bank ("*ECCB*") where applicable, for AML/CFT oversight and financial sector compliance

2.3 In addition, data protection practices are governed by Saint Lucia's Data Protection Act, in force since early 2023. Under this law, personal data must be processed in accordance with core principles: lawful collection, limited purpose, data quality, use limitation, security safeguards, accountability, and rights for individuals to access, correct, and in some cases erase their data. Data controllers must register with the Data Protection Commissioner and implement appropriate security measures. Transfers of personal data outside Saint Lucia are only permitted to jurisdictions with adequate protection regimes.

3. ROLES AND RESPONSIBILITIES

The Board of Directors is responsible for approving this Policy and for allocating sufficient resources to ensure its effective implementation. The designated Compliance Officer maintains and updates the AML/CFT and KYC programme, files Suspicious Transaction Reports ("*STRs*") and Currency Transaction Reports ("*CTRs*") with the Financial Intelligence Authority ("*FIA*") and liaises with the Financial Services Regulatory Authority ("*FSRA*"), the Eastern Caribbean Central Bank ("*ECCB*") (where applicable), and other relevant regulatory authorities.

All employees must complete mandatory AML/KYC training in accordance with the Money Laundering (Prevention) Act and related legislation and must report any suspicions of illicit activity to the Compliance Officer without delay.

4. USER IDENTIFICATION AND VERIFICATION

Before establishing any business relationship, INVIDIATRADE conducts a risk assessment to classify each client as low, medium, or high risk based on factors such as geographic location, expected transaction volume, and product usage. We collect identification documents that conform to the applicable regulations:

natural persons must present a valid national identity card, passport, or driver’s licence, while juristic entities must provide a certificate of incorporation, proof of registered address, and details of directors and ultimate beneficial owners.

We verify these documents through reliable, independent sources or accredited electronic databases where available.

5. CUSTOMER DUE DILIGENCE (“*CDD*”)

As part of our CDD procedures, we collect and record essential client information, including the client’s full name, date of birth, nationality, residential address, and contact details. We screen each client against international sanctions lists, Politically Exposed Person (“*PEP*”) registries, and reputable adverse-media sources to ensure that we understand each client’s background fully.

6. ENHANCED DUE DILIGENCE (“*EDD*”)

INVIDIATRADE applies enhanced due diligence measures to clients who present a higher risk, such as PEPs, clients from jurisdictions identified as having elevated money-laundering concerns, or those with complex ownership structures. For these relationships, we obtain additional documentary evidence of source of funds and source of wealth, require senior management approval to onboard the client, and conduct more frequent reviews of the client’s profile and transaction activity.

7. ONGOING MONITORING

Once a business relationship is established, we continuously monitor account activity through both automated systems and manual reviews to detect transactions that deviate from expected patterns in size, frequency, or counterparty. We refresh KYC documentation at least every twelve months for high-risk clients and every thirty-six (36) months for lower-risk clients. Any material change in a client's profile triggers an immediate review and update of their due-diligence records.

8. REPORTING OBLIGATIONS

INVIDIATRADE files a STR with the Financial Intelligence Authority ("*FIA*") within twenty-four (24) hours of identifying any transaction that may involve money laundering or terrorist financing.

We submit Currency Transaction Reports ("*CTRs*") for all cash transactions exceeding the equivalent of ten thousand USD ($10,000), or the applicable local currency threshold as prescribed under the Money Laundering (Prevention) Act, within fifteen (15) business days of the transaction.

If we detect property or funds linked to terrorist activities, we file a Terrorist Property Report ("*TPR*") with the FIA within twenty-four (24) hours of detection, in accordance with the Anti-Terrorism Act and related regulations.

9. SANCTIONS AND PEP SCREENING

We screen all new clients against the United Nations Security Council sanctions lists and relevant domestic sanctions regulations. We re-screen our entire client base quarterly and whenever a material change occurs in a client's profile to ensure ongoing compliance.

10. RECORD KEEPING

In accordance with the applicable laws, INVIDIATRADE retains all client identification records, transaction logs, screening results, and related correspondence for a minimum of **seven (7) years**. These records are stored securely in tamper-evident systems with restricted access, and regular backups are performed to ensure data integrity and recoverability.

11. TRAINING AND AWARENESS

All new employees undergo mandatory AML/KYC induction training upon hiring, and all staff members complete annual refresher courses. We also provide role-specific training modules for frontline personnel, compliance teams, risk managers, and internal auditors. These programmes are updated regularly to reflect changes in regulatory requirements and emerging typologies of financial crime.

12. DATA PROTECTION AND CONFIDENTIALITY

INVIDIATRADE handles all personal and corporate information collected under this Policy in accordance with our Privacy and Data Protection Policy and the requirements of Saint Lucia's Data Protection Act. Access to sensitive records is restricted to authorised personnel only, and all STRs, CTRs, TPRs, and internal investigation materials are treated as strictly confidential in accordance with applicable law.

13. POLICY REVIEW

This AML/KYC Policy is reviewed at least annually, or sooner if there are material changes in the applicable legislation, regulatory guidance, Company's risk profile, product offerings, or organisational structure. Any proposed amendments must be approved by the Board of Directors before implementation.

14. CONTACT INFORMATION

If you have any questions about our AML/KYC procedures or wish to request a copy of our full AML/CFT programme, please contact our Compliance Officer at:

support@invidiatrade.com