

AML AND CFT POLICY

Anti-Money Laundering and Counter-Terrorists Financing (AML/CFT) Policy

East Fortune Global Limited. (herein after referred as our “Company”) AML/CFT Policy (the “Policy”) endeavors to comply with the requirements and obligations set out in Singapore and international legislations, regulations, rules and industry guidance for the financial services sector, including the need to have adequate systems and controls in place to mitigate the risk of our Company being used to facilitate financial crime. Leaving such acts will lead to letting profits from crimes be used for criminal activities in the future, and also letting criminal syndicates affect power on lawful economic activities. Furthermore, money laundering is becoming more internationalized, dexterous, and complicated in recent years, and therefore international coordination is strongly required for its protection.

As part of this Policy, our Company may make enquiries as to your identity and other personal information as may be required under the Anti-Money Laundering and Counter Terrorist Financing Ordinance. Your personal information will be treated in accordance with the Personal Data (Privacy) Ordinance. Our Company may require our customers to provide additional information or documentation to fulfill our legal obligations and where we deem appropriate and may refuse any customer or transaction that is suspected of being related to financial crimes. In the event that we become aware of any illegal activity, impropriety or failure to comply with any of our due diligence requirement, we may not establish a business relationship with you and your account may be frozen pending investigation or verification as a result. Should such an event occur we may not be in a position to carry out any subsequent instructions from you, including the release of funds or cryptocurrency thereof.

Cryptocurrencies dealt with us have natures such as high anonymity of users, and can be promptly and internationally transferred. As each country has different regulations against cryptocurrencies, it has been pointed out that tracing profits from crimes will be difficult when cryptocurrencies are exploited for such crimes. Our Company strongly recognizes the importance of preventive measures against money laundering activities and organizes the following minimum internal management system which include:

1. Organizational System

Our board of directors, who are vested with decision making powers, considers the establishment of a prevention system against money laundering as our most important business matter. The board of directors has established internal policies, standards, and management guidelines to prevent money laundering activities. We also establish an internal anti-money laundering unit to prevent money laundering which will include the appointment of the appropriate personnel in charge, instructing the appointed persons to collect information on money laundering activities and provide with the appropriate responses and prepare regular or timely reports.

2. Management Policy

Our Company builds a risk management system to prevent money laundering in order to clarify the roles in the company and carry out the appropriate actions in a timely manner.

3. Identification Confirmation

Our Company makes arrangements required to carry out appropriate actions in a timely manner for identification confirmation including the establishment and maintenance of a risk-based customer due diligence, identification, verification and know your customer (KYC) procedures, including enhanced due diligence for those customers presenting a higher risk.

4. Notification of Suspicious Transactions

Our Company has established internal procedures for reporting on suspicious transactions or fraudulent use of identification documents that are detected through our transaction monitoring system to the relevant law enforcement authorities as appropriate.

5. Training of Officers and Employees

Our Company regularly attends training for all officers and employees, and external training for the staff in charge of anti-money launderings in order to allow them to obtain knowledge and improve awareness to prevent money laundering activities.

6. Audit of the Status of Compliance

Our Company regularly audits the status of compliance with regard to preventive measures against money laundering, etc. by independent auditors, in order to improve the system based on the results of the audit.