Anti-Money Laundering (AML) Policy

1. Purpose and Scope

This Policy is issued by LUMIEX LTD and its affiliated entities (collectively referred to as “Lumiex” or “the Company”). Its purpose is to establish a transparent framework for preventing money laundering and terrorism financing within Lumiex’s operations and client ecosystem. The Policy applies to all employees, clients, introducing brokers (IBs), affiliates, and any third party conducting transactions or maintaining accounts with Lumiex.

2. Definition of Money Laundering and Terrorism Financing

Money laundering refers to any activity that conceals or disguises the illegal origin of money or property, making it appear legitimate. Terrorism financing involves providing or collecting funds—directly or indirectly—to support or execute terrorist acts or organizations.

Examples include:

- Using another person’s identity or fraudulent documents to open accounts.
- Conducting multiple small transfers to avoid reporting thresholds.
- Converting funds from criminal activities into financial instruments or digital assets.

3. Legal Framework and Compliance Obligations

Lumiex adheres to international standards including, but not limited to:

- Financial Action Task Force (FATF) Recommendations;
- EU Anti-Money Laundering Directive (AMLD 5 & 6);
- UK Money Laundering Regulations 2017;
- MAS Notice 626 (Singapore) and comparable APAC guidelines.

The Company maintains internal systems and controls to identify, assess, and mitigate risks related to money laundering and terrorism financing.

4. Know Your Customer (KYC) and Client Identification

Lumiex performs a KYC verification process at multiple stages, including registration, deposits, withdrawals, and any non-trading transactions. Clients must provide valid government-issued identification, proof of residence, and information on source of funds or income. The Company verifies data accuracy using secure systems and may require additional documentation where risk level is elevated.

5. Monitoring and Reporting of Suspicious Activities

Lumiex continuously monitors client activity to detect and prevent suspicious transactions. Indicators may include:

- Frequent high-value transfers inconsistent with the client's profile.
- Repeated deposits and withdrawals with no trading intent.
- Rapid movement of funds between multiple accounts.

Any suspicious behaviour is escalated to the Compliance Officer, who assesses and, when required, files a Suspicious Activity Report (SAR) to relevant authorities in accordance with applicable laws.

6. Internal Training and Awareness

Lumiex ensures that all employees, contractors, and IB partners are trained to recognize early signs of potential money-laundering schemes, protect sensitive client data, and follow internal escalation procedures. Training is mandatory during onboarding and refreshed annually or upon regulatory updates.

7. Data Protection and Confidentiality

All personal data collected for KYC and AML purposes is processed strictly under the Lumiex Privacy Policy. The identification procedure is a legal requirement and does not imply any suspicion of wrongdoing. Client information is kept confidential and disclosed only when required by law.

8. Cooperation with Authorities and Sanction Compliance

Lumiex fully cooperates with authorized law-enforcement and regulatory bodies in investigations of financial crime. The Company screens clients and transactions against global sanctions lists (UN, EU, OFAC, UK HMT). Accounts or transactions linked to sanctioned entities are frozen or terminated as required by law.

9. Review and Update

This Policy is reviewed at least annually or whenever international AML regulations change. Updates are approved by the Lumiex Compliance Department and published through official communication channels.

10. Annex A — Key Terminology

Term	Definition	中文释义
AML	Anti-Money Laundering — measures preventing the concealment of illegal funds.	反洗钱
CFT	Counter Financing of Terrorism.	反恐怖融资
KYC	Know Your Customer — client identification procedure.	客户识别
SAR	Suspicious Activity Report filed to authorities.	可疑活动报告
FATF	Financial Action Task Force — international AML standard-setter.	金融行动特别工作组

11. Legal References

- FATF Recommendations (2023 Revision)
- EU Directive (EU) 2018/843 (AMLD5)
- UK Money Laundering Regulations (2017 as amended 2022)
- MAS Notice 626 and Financial Institutions (AML/CFT) Guidelines
- Lumiex Internal Compliance Manual (2025 Edition)