

Fyexa Capital

EST. 2025

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ANTI-MONEY LAUNDERING AND COUNTER-TERRORISM FINANCING POLICY

反洗钱和反恐融资政策

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PAGE 2

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1. INTRODUCTION / 介绍

1.1. **Fyexa Capital** combats against any forms of money laundering, terrorism financing or criminal activities with a strong dedication by strictly complying with the relevant applicable regulatory regulation.

Fyexa Capital 严格遵守相关适用的监管规定，以坚定的奉献精神打击任何形式的洗钱、恐怖主义融资或犯罪活动。

1.2. Our Money Laundering Reporting Officer ("Officer") and other compliance executives are employed to implement the appropriate Anti-Money Laundering and Counter-Terrorism Financing ("AML and CTF") policies and procedures. This AML and CTF policy shall cover procedures and processes:

我们的洗钱报告官("官员")和其他合规主管负责实施适当的反洗钱和反恐融资("AML 和 CTF")政策和程序。本 AML 和 CTF 政策应涵盖以下程序和流程：

A. On the client due diligence ("CDD") requirements;

关于客户尽职调查("CDD")的要求;

B. To implement the record-keeping requirements;

执行记录保存要求;

C. On the reporting requirements of any suspicious transactions;

关于任何可疑交易的报告要求。

PAGE 3

2. DEFINITIONS / 定义

2.1. **Money Laundering ("ML")**: The process of making illegally-gained proceeds (i.e. "dirty money") appear legal (i.e. "clean").

洗钱 ("ML"): 使非法所得(即“脏钱”)看起来合法(即“干净”)的过程。

2.2. **Terrorism Financing ("TF")**: The process by which terrorists or terrorist organizations are funded to carry out acts of terrorism.

反恐融资 ("TF"): 资助恐怖分子或恐怖组织实施恐怖主义行为的过程。

2.3. **Beneficial Owner**: Refers to the natural person(s) who ultimately owns or controls a client and/or the natural person on whose behalf a transaction is being conducted.

受益所有人: 指最终拥有或控制客户的自然人, 和/或代表其进行交易的自然人。

PAGE 4

3. LEGAL AND REGULATORY FRAMEWORK / 法律与监管框架

3.1. **Fyexa Capital** is registered in Anjouan, Union of Comoros (Registration No. **L16213/EFX**) and is regulated by the **Anjouan Offshore Finance Authority (AOFA)**.

Fyexa Capital 在科摩罗联盟安儒昂注册(注册编号 **L16213/EFX**), 并受安儒昂离岸金融管理局 (**AOFA**) 监管。

3.2. This policy is designed to comply with the AML/CTF laws and regulations of Anjouan and international standards set by the Financial Action Task Force (FATF).

本政策旨在遵守安儒昂的 AML/CTF 法律法规以及金融行动特别工作组 (FATF) 制定的国际标准。

PAGE 5

4. RISK-BASED APPROACH / 基于风险的方法

4.1. **Fyexa Capital** adopts a Risk-Based Approach ("RBA") to identifying and assessing ML and TF risks. This means that we apply enhanced measures to higher-risk clients and transactions.

Fyexa Capital 采用基于风险的方法 ("RBA") 来识别和评估洗钱和恐怖融资风险。这意味着我们对高风险客户和交易采取强化措施。

4.2. The risk assessment considers factors such as client type, country or geographic risk, and the nature of the products or services used.

风险评估考虑的因素包括客户类型、国家或地理风险, 以及所使用的产品或服务的性质。

PAGE 6

5. CLIENT DUE DILIGENCE (CDD) / 客户尽职调查

5.1. **Fyexa Capital** shall identify and verify the identity of each client before establishing a business relationship. No account shall be opened for anonymous or fictitious names.

Fyexa Capital 在建立业务关系之前应识别并核实每位客户的身份。不得为匿名或虚假名称开设账户。

5.2. For Individual Clients, required documents include:

对于个人客户, 所需文件包括:

- A valid government-issued photo ID (Passport, National ID);
有效的政府签发的照片身份证件(护照、国民身份证);
- Proof of residence (Utility bill or bank statement issued within the last 3 months).
居住证明(过去 3 个月内签发的水电费单或银行对账单)。

PAGE 7

6. ENHANCED DUE DILIGENCE (EDD) / 强化尽职调查

6.1. **Fyexa Capital** shall perform Enhanced Due Diligence (EDD) for clients identified as high risk, including Politically Exposed Persons (PEPs).

Fyexa Capital 应为被识别为高风险的客户(包括政治公众人物 PEP)进行强化尽职调查(EDD)。

6.2. EDD measures may include obtaining information on the source of wealth and source of funds of the client and obtaining senior management approval before opening the account.

EDD 措施可能包括获取有关客户财富来源和资金来源的信息，并在开户前获得高级管理层的批准。

PAGE 8

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7. CORPORATE CLIENT DUE DILIGENCE / 法人客户尽职调查

7.1. For clients that are legal persons or legal arrangements, **Fyexa Capital** shall identify and verify the client's identity, including:

对于法人或法律安排的客户，**Fyexa Capital** 应识别并核实客户的身份，包括：

A. Name, legal form and proof of existence;

名称、法律形式和存在证明；

B. The powers that regulate and bind the legal person or arrangement, as well as the names of the relevant persons having a senior management position;

规范和约束法人或法律安排的权力，以及担任高级管理职务的相关人员的姓名；

C. The address of the registered office and, if different, a principal place of business.

注册办事处的地址，如果不同，则为主要营业地点。

PAGE 9

8. BENEFICIAL OWNERSHIP / 受益所有权

8.1. **Fyexa Capital** shall identify the beneficial owners of the client and take reasonable measures to verify the identity of such persons.

Fyexa Capital 应识别客户的受益所有人，并采取合理措施核实此类人员的身份。

8.2. For legal persons, this includes identifying natural persons who exercise ultimate effective control over the legal person through direct or indirect ownership of a sufficient percentage of the shares or voting rights (typically 25% or more).

对于法人，这包括识别通过直接或间接拥有足够百分比的股份或投票权（通常为 25% 或更多）对该法人行使最终有效控制权的自然人。

PAGE 10

9. ONGOING MONITORING / 持续监控

9.1. **Fyexa Capital** shall conduct ongoing due diligence on the business relationship, including scrutiny of transactions undertaken throughout the course of that relationship.

Fyexa Capital 应对应建立的业务关系进行持续的尽职调查, 包括审查在该业务关系过程中进行的交易。

9.2. This ensures that the transactions being conducted are consistent with **Fyexa Capital's** knowledge of the client, their business and risk profile, including, where necessary, the source of funds.

这确保了所进行的交易与 **Fyexa Capital** 对客户、其业务和风险概况(包括必要时的资金来源)的了解一致。

PAGE 11

10. SIMPLIFIED DUE DILIGENCE (SDD) / 简化尽职调查

10.1. **Fyexa Capital** may apply Simplified Due Diligence (SDD) measures where the risk of money laundering or terrorist financing is identified as low.

当洗钱或恐怖主义融资风险被确定为低风险时, **Fyexa Capital** 可以采取简化尽职调查 (SDD) 措施。

10.2. SDD may be applied to publicly listed companies, government entities, or financial institutions regulated by an equivalent AML/CTF regime.

SDD 可适用于上市公司、政府实体或受同等 AML/CTF 制度监管的金融机构。

PAGE 12

11. RELIANCE ON THIRD PARTIES / 依赖第三方

11.1. **Fyexa Capital** may rely on third parties to perform CDD measures, provided that the third party is regulated and supervised for AML/CTF compliance.

Fyexa Capital 可能会依赖第三方执行 CDD 措施, 前提是该第三方受到 AML/CTF 合规性的监管和监督。

11.2. Notwithstanding any reliance on a third party, the ultimate responsibility for CDD measures remains with **Fyexa Capital**.

尽管依赖第三方, CDD 措施的最终责任仍由 **Fyexa Capital** 承担。

PAGE 13

12. PROHIBITION OF ANONYMOUS ACCOUNTS / 禁止匿名账户

12.1. **Fyexa Capital** shall not maintain anonymous accounts or accounts in fictitious names.

Fyexa Capital 不得维持匿名账户或虚假名称的账户。

12.2. Any attempt to open such an account will be reported to the relevant authorities as a suspicious activity.

任何开设此类账户的企图都将作为可疑活动向相关当局报告。

PAGE 14

13. RECORD KEEPING / 记录保存

13.1. **Fyexa Capital** shall maintain all necessary records on transactions and information obtained through CDD measures for at least five (5) years following the termination of the business relationship.

Fyexa Capital 应在业务关系终止后至少五 (5) 年内, 保存所有必要的交易记录以及通过 CDD 措施获得的信息。

13.2. These records must be sufficient to permit reconstruction of individual transactions so as to provide, if necessary, evidence for prosecution of criminal activity.

这些记录必须足以重建个人交易, 以便在必要时为起诉犯罪活动提供证据。

PAGE 15

14. SUSPICIOUS TRANSACTION REPORTING / 可疑交易报告

14.1. If **Fyexa Capital** suspects or has reasonable grounds to suspect that funds are the proceeds of a criminal activity or are related to TF, it shall report its suspicions promptly to the relevant Financial Intelligence Unit (FIU).

如果 **Fyexa Capital** 怀疑或有合理理由怀疑资金是犯罪活动的收益或与 TF 有关, 应立即向相关的金融情报机构 (FIU) 报告其怀疑。

14.2. **Tipping-off Prohibition: Fyexa Capital**, its directors, and employees are prohibited by law from disclosing the fact that a suspicious transaction report (STR) or related information is being reported to the FIU.

禁止泄密：法律禁止 **Fyexa Capital** 及其董事和员工披露正在向 FIU 提交可疑交易报告 (STR) 或相关信息的事实。

PAGE 16

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15. POLITICALLY EXPOSED PERSONS (PEPs) / 政治公众人物

15.1. **Fyexa Capital** shall implement appropriate risk management systems to determine whether a client or the beneficial owner is a Politically Exposed Person (PEP).

Fyexa Capital 应实施适当的风险管理系统，以确定客户或受益所有人是否为政治公众人物 (PEP)。

15.2. For PEPs, their family members, or close associates, **Fyexa Capital** shall:

对于 PEP、其家庭成员或关系密切的联系人，**Fyexa Capital** 应：

A. Obtain senior management approval before establishing or continuing the business relationship;

在建立或继续业务关系之前获得高级管理层的批准；

B. Take reasonable measures to establish the source of wealth and source of funds;

采取合理措施确定其财富来源和资金来源；

C. Conduct enhanced ongoing monitoring of the business relationship.

对该业务关系进行强化的持续监控。

PAGE 17

16. TRANSACTIONS BY REPRESENTATIVES / 代理人交易

16.1. Where a person acts or appears to act on behalf of a client, **Fyexa Capital** shall identify and verify the identity of that person and their authority to act on behalf of the client.

如果有人代表或看似代表客户行事，**Fyexa Capital** 应识别并核实该人的身份及其代表客户行事的授权。

16.2. The verification process for representatives shall be as rigorous as the process for the clients themselves.

对代理人的核实程序应与对客户本人的核实程序同样严格。

PAGE 18

17. SANCTIONS SCREENING / 制裁名单筛查

17.1. **Fyexa Capital** shall screen all clients, beneficial owners, and transactions against relevant international sanctions lists, including those issued by the United Nations (UN), and other applicable jurisdictions.

Fyexa Capital 应根据相关的国际制裁名单(包括联合国及其他适用司法管辖区发布的名单)对所有客户、受益所有人及交易进行筛查。

17.2. **Fyexa Capital** shall not establish or maintain a business relationship with any person or entity included in these sanctions lists.

Fyexa Capital 不得与这些制裁名单中列出的任何个人或实体建立或维持业务关系。

PAGE 19

18. EMPLOYEE TRAINING AND AWARENESS / 员工培训与意识

18.1. **Fyexa Capital** shall ensure that its employees are made aware of the AML and CTF laws and regulations and this policy.

Fyexa Capital 应确保其员工了解 AML 和 CTF 法律法规以及本政策。

18.2. Relevant employees shall receive regular training on how to identify suspicious transactions and their obligations under the law.

相关员工应定期接受有关如何识别可疑交易及其法律义务的培训。

PAGE 20

19. ROLE OF THE COMPLIANCE OFFICER / 合规官的角色

19.1. The Money Laundering Reporting Officer (MLRO) is responsible for:

洗钱报告官 (MLRO) 负责:

A. Overseeing the implementation of the AML/CTF policy;

监督 AML/CTF 政策的执行;

B. Receiving and evaluating internal suspicious activity reports;

接收并评估内部可疑活动报告;

C. Reporting suspicious activities to the relevant authorities.

向相关当局报告可疑活动。

PAGE 21

20. INTERNAL AUDIT AND REVIEW / 内部审计与审查

20.1. **Fyexa Capital** shall maintain an independent audit function to test the effectiveness of its AML/CTF policies, procedures, and controls.

Fyexa Capital 应保持独立的审计职能，以测试其 AML/CTF 政策、程序和控制措施的有效性。

20.2. The review shall be conducted regularly, and the results shall be reported to senior management for necessary action.

审查应定期进行，结果应报告给高级管理层以便采取必要行动。

PAGE 22

21. CORRESPONDENT BANKING / 代理行业务

21.1. **Fyexa Capital** does not engage in shell banking. We only establish relationships with reputable financial institutions that have adequate AML/CTF controls.

Fyexa Capital 不从事“空壳银行”业务。我们仅与具有充分 AML/CTF 控制措施且信誉良好的金融机构建立关系。

21.2. We shall gather sufficient information about a respondent institution to understand the nature of its business and its reputation.

我们应收集有关代理机构的充分信息，以了解其业务性质和声誉。

PAGE 23

22. NEW TECHNOLOGIES AND PRODUCTS / 新技术与产品

22.1. **Fyexa Capital** shall identify and assess the ML/TF risks that may arise in relation to the development of new products and new business practices.

Fyexa Capital 应识别并评估与开发新产品和新业务实践相关的可能出现的洗钱/恐怖融资风险。

22.2. Risk assessments shall take place prior to the launch of the new products or business practices.

风险评估应在新产品或业务实践推出之前进行。

PAGE 24

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23. WIRE TRANSFERS AND PAYMENTS / 电汇与付款

23.1. **Fyexa Capital** shall ensure that all wire transfers are accompanied by accurate and meaningful originator and beneficiary information.

Fyexa Capital 应确保所有电汇均附带准确且有意义的汇款人和受益人信息。

23.2. We do not accept cash deposits or anonymous money orders. All funds must originate from a bank account or payment processor held in the same name as the **Fyexa Capital** trading account.

我们不接受现金存款或匿名汇票。所有资金必须来源于与 **Fyexa Capital** 交易账户同名的银行账户或支付处理器。

PAGE 25

24. SOURCE OF FUNDS (SOF) AND SOURCE OF WEALTH (SOW) / 资金来源与财富来源

24.1. In certain circumstances, especially for high-risk clients or large transactions, **Fyexa Capital** will require documentation to verify the Source of Funds (SOF) and Source of Wealth (SOW).

在某些情况下，特别是针对高风险客户或大额交易，**Fyexa Capital** 将要求提供文件以验证资金来源 (SOF) 和财富来源 (SOW)。

24.2. Acceptable documentation may include bank statements, payslips, audited accounts, or legal documents relating to the sale of assets or inheritance.

可接受的文件可能包括银行结单、工资单、经审计的账目，或与资产出售或遗产继承相关的法律文件。

PAGE 26

25. NON-COMPLIANCE CONSEQUENCES / 不合规的后果

25.1. Failure to provide requested CDD or SOF documentation within the specified timeframe may result in:

未能按时提供要求的 CDD 或 SOF 文件可能导致：

A. Rejection of the account application;

拒绝开户申请；

B. Suspension of trading activities;

暂停交易活动；

C. Freezing of funds and termination of the business relationship.

冻结资金并终止业务关系。

PAGE 27

26. TRANSACTION MONITORING INDICATORS / 交易监控指标

26.1. **Fyexa Capital** monitors for "red flag" indicators, which include but are not limited to:

Fyexa Capital 监控“红旗”指标, 包括但不限于:

A. Unusual trading patterns with no apparent economic purpose;

没有明显经济目的的异常交易模式；

B. Frequent small deposits followed by large withdrawals;

频繁小额存款后进行大额取款；

C. Transactions involving high-risk jurisdictions.

涉及高风险司法管辖区的交易。

PAGE 28

27. SHELL BANKS PROHIBITION / 禁止空壳银行

27.1. **Fyexa Capital** is strictly prohibited from entering into, or continuing, a correspondent banking relationship with a shell bank.

严禁 **Fyexa Capital** 与空壳银行建立或维持代理行关系。

27.2. We are also required to take reasonable measures to ensure that we do not settle transactions with respondent financial institutions that permit their accounts to be used by shell banks.

我们还被要求采取合理措施, 确保不与允许空壳银行使用其账户的代理金融机构结算交易。

PAGE 29

28. DATA PRIVACY AND AML COMPLIANCE / 数据隐私与反洗钱合规

28.1. Personal data collected for AML/CTF purposes will be processed in accordance with **Fyexa Capital's** Privacy Policy and applicable data protection laws.

为 AML/CTF 目的收集的个人信息将根据 **Fyexa Capital** 的隐私政策和适用的数据保护法律进行处理。

28.2. However, the obligation to report suspicious activity to regulatory authorities overrides certain client confidentiality requirements under the law.

然而，向监管机构报告可疑活动的义务优先于法律规定的某些客户保密要求。

PAGE 30

29. HIGH-RISK JURISDICTIONS / 高风险司法管辖区

29.1. **Fyexa Capital** applies enhanced measures to business relationships and transactions with persons from countries identified by the FATF or AOFA as having strategic AML/CTF deficiencies.

Fyexa Capital 对来自被 FATF 或 AOFA 认定为在 AML/CTF 方面存在战略缺陷国家的个人及其业务关系和交易采取强化措施。

29.2. We may decline applications or terminate relationships with residents of countries that are subject to international counter-measures.

我们可能会拒绝来自受国际反制措施影响的国家居民的申请或终止与其的关系。

PAGE 31

30. INTERNAL REPORTING PROCEDURES / 内部报告程序

30.1. Any employee who becomes aware of a suspicious transaction or activity must immediately file an internal report to the MLRO.

任何意识到可疑交易或活动的员工必须立即向 MLRO 提交内部报告。

30.2. Employees are protected from any internal disciplinary action for making such reports in good faith, even if the suspicion later proves to be unfounded.

员工因出于善意提交此类报告而受保护，免受任何内部纪律处分，即使该怀疑后来被证明是不成立的。

PAGE 32

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31. CUSTOMER IDENTIFICATION PROGRAM (CIP) / 客户识别程序

31.1. **Fyexa Capital** shall implement a Customer Identification Program (CIP) to verify the identity of any person seeking to open an account, to the extent reasonable and practicable.

Fyexa Capital 应实施客户识别程序 (CIP), 在合理且可行的范围内核实任何寻求开户的人员身份。

31.2. The CIP includes:

CIP 包括: A. Collecting identifying information (Name, DOB, Address, ID Number);

收集识别信息(姓名、出生日期、地址、证件号码); B. Verifying the information using reliable, independent source documents;

使用可靠、独立的原始文件核实信息; C. Maintaining records of the information used to verify identity.

保存用于核实身份的信息记录。

PAGE 33

32. RISK RATING METHODOLOGY / 风险评级方法

32.1. **Fyexa Capital** assigns a risk rating to every client at the time of account opening. The ratings are: **Low, Medium, and High**.

Fyexa Capital 在开户时为每位客户分配风险评级。评级分为:低、中、高。

32.2. Factors determining the risk rating include:

确定风险评级的因素包括:

- **Geography:** Whether the client is from a high-risk or sanctioned country;
地理:客户是否来自高风险或受制裁国家;
 - **Entity Type:** Individuals vs. complex corporate structures;
实体类型:个人与复杂的公司结构;
 - **Transaction Profile:** Expected volume and frequency of trading.
交易概况:预期的交易量和频率。
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PAGE 34

33. MONITORING FOR COMPLEX TRANSACTIONS / 对复杂交易的监控

33.1. **Fyexa Capital** shall pay special attention to all complex, unusually large transactions, and all unusual patterns of transactions, which have no apparent economic or visible lawful purpose.

Fyexa Capital 应特别关注所有复杂的、异常巨大的交易以及所有没有明显经济或合法目的的异常交易模式。

33.2. The background and purpose of such transactions shall, as far as possible, be examined, the findings established in writing, and be available to help competent authorities.

应尽可能审查此类交易的背景和目的, 将调查结果建立书面记录, 并可用于协助主管当局。

PAGE 35

34. COMPLIANCE AUDIT FREQUENCY / 合规审计频率

34.1. An independent review of the AML/CTF program shall be conducted at least annually, or more frequently if there are significant changes to the business or regulatory environment.

应至少每年对 AML/CTF 计划进行一次独立审查, 如果业务或监管环境发生重大变化, 则应增加频率。

34.2. The audit covers the effectiveness of internal controls, the accuracy of risk ratings, and the adequacy of employee training.

审计涵盖内部控制的有效性、风险评级的准确性以及员工培训的充分性。

PAGE 36

35. SUSPENSION OF SERVICES / 暂停服务

35.1. **Fyexa Capital** reserves the right to suspend any service or transaction if it has reason to believe that the client is involved in ML or TF activities.

如果 **Fyexa Capital** 有理由认为客户涉及洗钱或恐怖融资活动, 保留暂停任何服务或交易的权利。

35.2. During suspension, funds may be withheld until the investigation is cleared by the Compliance Officer or the relevant authorities.

在暂停期间, 资金可能会被扣留, 直到合规官或相关当局完成调查并予以清除。

PAGE 37

36. RELIANCE ON INTRODUCING BROKERS (IBs) / 对介绍经纪商 (IB) 的依赖

36.1. Where a client is introduced by an IB, **Fyexa Capital** remains responsible for performing the final CDD and verifying the client's identity.

如果客户是由介绍经纪商 (IB) 介绍的, **Fyexa Capital** 仍负责执行最终的 CDD 并核实客户身份。

36.2. IBs are required to assist in gathering the necessary documentation as per **Fyexa Capital's** standards.

要求 IB 根据 **Fyexa Capital** 的标准协助收集必要的文件。

PAGE 38

37. TREATMENT OF NON-FACE-TO-FACE CLIENTS / 非面对面客户的处理

37.1. For clients who open accounts online, **Fyexa Capital** applies specific and adequate measures to mitigate the higher risk of non-face-to-face identification.

对于在线开户的客户, **Fyexa Capital** 采取具体且充分的措施, 以降低非面对面识别带来的更高风险。

37.2. This may include digital ID verification, video calls, or requiring the first deposit to be made from a bank account in the client's name.

这可能包括数字身份验证、视频通话, 或要求首笔存款必须从客户名下的银行账户汇入。

PAGE 39

38. PROHIBITION OF TRANSACTION SPLITTING / 禁止拆分交易

38.1. **Fyexa Capital** prohibits the splitting of large transactions into multiple smaller transactions to avoid reporting thresholds (Structuring).

Fyexa Capital 禁止将大额交易拆分为多个小额交易以规避报告阈值(结构化交易)。

38.2. Any identified structuring activity will be flagged for an immediate Suspicious Transaction Report (STR).

任何被识别的结构化活动都将被标记, 并立即提交可疑交易报告 (STR)。

PAGE 40

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39. CONTINUOUS TRAINING PROGRAM / 持续培训计划

39.1. **Fyexa Capital** will provide additional, necessary and sufficient training to its employees on a continuous basis to ensure they stay updated on the latest ML/TF trends and regulatory changes.

Fyexa Capital 将持续向员工提供额外的、必要的和充分的培训，以确保他们了解最新的洗钱/恐怖融资趋势和监管变化。

39.2. Training records, including the names of employees trained and the dates of training, shall be maintained by the Compliance Department for at least five (5) years.

培训记录(包括受训员工姓名和培训日期)应由合规部门保存至少五(5)年。

PAGE 41

15. LANGUAGE AND AMENDMENTS / 语言和修改

15.1. The official language of this AML and CTF policy shall be English. **Fyexa Capital** may provide this AML and CTF policy in other languages for information purposes only and in the event of any inconsistency or discrepancy between the English version of this AML and CTF policy and any other language version, the English version shall prevail.

本 AML 和 CTF 政策的官方语言为英语。**Fyexa Capital** 可能会以其他语言提供本 AML 和 CTF 政策，仅供参考，如果本 AML 和 CTF 政策的英文版本与任何其他语言版本之间存在任何不一致或差异，以英文版本为准。

PAGE 42

15.2. AMENDMENTS / 修改

The client acknowledges that **Fyexa Capital** reserves the right to amend or update this AML and CTF policy at any time without prior notice to the client. The amendments to the AML and CTF policy shall become effective immediately and shall be legally binding on the client upon publishing of the AML and CTF policy on **Fyexa Capital's** website.

客户承认 **Fyexa Capital** 保留随时修改或更新本 AML 和 CTF 政策的权利，恕不另行通知客户。AML 和 CTF 政策的修订应在 **Fyexa Capital** 网站上公布后立即生效，并对客户具有法律约束力。

The client undertakes to regularly review this AML and CTF policy on the **Fyexa Capital's** website to ensure compliance with the latest requirements.

客户承诺定期在 **Fyexa Capital** 网站上查看本 AML 和 CTF 政策, 以确保符合最新要求。

PAGE 43

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