

ApogeeX - Money Laundering Prevention Policy

Effective date: April 2026

Website: <https://axfx.com>

Support: support@axfx.com

Complaints: complaints@axfx.com

This Money Laundering Prevention Policy is issued by **ApogeeX Capital LLC** ("ApogeeX", "we", "us" or "our"), a limited liability company registered in Saint Vincent and the Grenadines under company number **4536 LLC 2026**, with its registered office at Suite 305, Griffith Corporate Centre, Beachmont, Kingstown, St. Vincent and the Grenadines.

1. Purpose and Commitment

ApogeeX is committed to preventing the use of its services for money laundering, terrorist financing, proliferation financing, fraud and other financial crime. This Policy summarises the controls we apply to achieve this.

2. Legal Framework and Standards

ApogeeX applies controls designed to comply with the anti-money laundering and counter-terrorist financing laws that apply to it, and follows the recommendations of the Financial Action Task Force (FATF) as international best practice.

3. Governance

Senior management is responsible for our anti-money laundering framework. A designated compliance officer oversees its implementation, receives internal reports of suspicious activity and decides whether matters should be reported to the competent authorities.

4. Risk-Based Approach

We apply a risk-based approach, taking into account factors including:

- the client's type and profile;
- the jurisdictions involved;
- the products and services used;
- the size, frequency and pattern of transactions; and
- the payment methods and channels used.

Enhanced measures are applied where higher risks are identified.

5. Customer Due Diligence

We carry out customer due diligence before opening an account and throughout the relationship. This includes:

- identifying clients and verifying their identity using reliable, independent documents or data;
- identifying and verifying beneficial owners, controllers and authorised persons, where applicable;
- understanding the purpose and intended nature of the relationship;
- applying enhanced due diligence to higher-risk clients, jurisdictions or activities; and

keeping client information up to date.

We may request additional documents or information at any time, including before processing a deposit, withdrawal or other transaction. An account will not be opened, and a transaction may not be processed, until satisfactory information has been provided.

6. Ongoing Monitoring

We monitor client accounts and transactions on an ongoing basis to detect unusual or suspicious activity, using automated and manual reviews.

7. Suspicious Activity Reporting

Suspicious activity is escalated internally and, where required, reported to the competent authorities. We are generally not permitted to inform a client that a report has been made or that an investigation is under way.

8. Sanctions

We screen clients, beneficial owners and relevant transactions against applicable sanctions lists. We do not accept clients or transactions involving sanctioned persons or entities, and we will freeze or report assets where required by law.

9. Record Keeping

We keep records of client identification and verification, transactions, monitoring and internal and external reports for the periods required by applicable law.

10. Staff Training

Our staff receive anti-money laundering training when they join and periodically afterwards, so that they understand their obligations, can recognise suspicious activity and know how to report it.

11. Disclosure and Cooperation

Information provided to ApogeeX may be disclosed, without notice to the client, to competent authorities where required by law, including authorities in the jurisdiction where ApogeeX is incorporated and in the jurisdictions from which client funds are received or to which they are paid. ApogeeX cooperates with regulators and law enforcement agencies in accordance with applicable law.

12. Refusal, Restriction and Termination

ApogeeX may refuse to open an account, refuse or delay any transaction, restrict an account or terminate a relationship where it has concerns relating to identity verification, sanctions, fraud, money laundering or other financial crime.

13. Policy Review

This Policy is reviewed periodically and may be updated at any time. The current version is published at axfx.com. Questions about required documents may be sent to support@axfx.com.