



Stryk is a trading name of BUX Europe Limited,
(Regulated by the Cyprus Securities & Exchange Commission)

Anti-Money Laundering Policy

Approved by	Board of Directors
Classification	Anti-Money Laundering Policy
Version	4

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1. Introduction

'BUX EUROPE LIMITED' is a Cyprus Investment Firm incorporated under the laws of Cyprus, which has its principal place of business at 67 Franklin Roosevelt Avenue, Lima Carna building, office 101, 3011 Limassol, Cyprus and registered with the Registrar of Companies in Nicosia under number: HE 350475 (the "**Company**"). The Company is authorised and regulated as a Cyprus Investment Firm ('CIF') by the Cyprus Securities and Exchange Commission ('CySEC', 'Commission' or 'Regulator') under licence number 374/19.

The Customer acknowledges that the Company's official language is English and our communication with you will be in English. Any other language will be used for convenience purposes only.

The Company is operating under Directive 2014/65/EU of the European Parliament and of the Council of 15 May 2014 on Markets in financial instruments and amending Directive 2002/92/EC and Directive 2011/61/EU (the "Markets in Financial Instruments Directive (2014/65/EU)" or "MiFID II") and amending Directive 2002/92/EC and Directive 2011/61/EU, as last amended by Directive (EU) 2016/1034 of the European Parliament and of the Council, of 23 June 2016 and under Regulation (EU) No 600/2014 of the European Parliament and the Council of 15 May 2014 on markets in financial instruments and amending Regulation (EU) No 648/2012 (the "MiFIR") which was implemented in Cyprus by the Investment Services and Activities and Regulated Markets Law of 2017 (Law 87(I)/2017), which provide for the provision of Investment Services, the exercise of Investment Activities, the operation of Regulated Markets and other related matters (the "Investment Services and Activities and Regulated Markets Law"), as the same may be modified and amended from time to time.

2. Anti-Money Laundering Provisions Framework

The Company actively prevents any activity that promotes money laundering. These Provisions require that the Company management and personnel follow specific standards that prevent the use of their products and services for money laundering, following the Prevention and Suppression of Money Laundering and Terrorist Financing Law-L188(I)/2007 as amended from time to time (hereafter the "AML Law") and The Directive of Prevention of Money Laundering and Terrorist Financing 2020 (hereafter the "AML Directive"), other Directives and Circulars issued by the CySEC.

Money laundering means actions intended to conceal or mask the criminal origin of the income and exchange for money or other assets that are 'clean'.

Anti-money laundering procedures mean that the Company requests that its Customers present respective documents confirming their identity and from where the money credited to the trading account opened with the Company to purchase specific products and services has come. If the Customer of the Company is a legal entity, then such a Customer shall provide the Company with the documents confirming its legal incorporation under the law of the country where the legal entity is a resident.

Fulfilling its obligations under these Provisions, the Company has established the following mandatory rules for all Customers:

- When crediting funds to the trading account, the name of the sender shall fully correspond to the name indicated during the registration of the Personal Account.
- Payments from third parties are not allowed.
- Funds may be withdrawn only through the same payment method they were deposited to the trading account.
- When transferring funds from the Customer's Trading Account to banking account(s) or to accounts in an electronic payment system, this transaction may not be performed unless the name of the addressee corresponds in full with the name indicated in the registration form for a Personal Account at the Company.

The Company shall closely monitor suspicious actions and transactions and inform controlling bodies of such actions in a timely manner.

In compliance with the Company's requirements to check a Customer's identity the Customer shall confirm his/her name, personal data, and address with legally valid documents, upon request.

The Company is not authorized to and is not obliged to determine whether the identity document, provided by the Customer, is legal. However, in the case that it is evident that the information obtained does not correspond to that required the Company may require that the Customer provides additional documents to establish his/her identity. In the event that the Customer refuses to provide the required information, as and when requested, or attempts to mislead Company's employees, the Company may

refuse to render services to such a Customer.

If the Company finds any signs of suspicious activities that may be related to money laundering, information thereof shall be communicated to the competent bodies.

3. Account Opening Document Requirements

3.1 Proof of Identity - The following are acceptable forms of photo identification:

- Valid passport
- Valid National Identity Card
- Valid Driver's Licence (if none of the two above are available)

The document must be valid and issued on your name and all information on the document including your photo must be visible.

! Please keep in mind that your Proof of Identity must be always kept up to date.

3.2 Proof of Residence - The following are acceptable forms of proof of residence:

- Bank Statement
- Governmental documents such as tax bill or residence certificate (stamped)
- Utility Bills (except for mobile phone bills)

All proof of residence documents must be recent (not older than 6 months), show your name, permanent address, date of issue and name and/or logo of the company / bank / authority that issued the document.

! Please keep in mind that your Proof of Residence must be always kept up to date.

We must be able to understand the language shown on your Photo ID and Proof of Residence. Please provide an English translation of your documents so that we can verify your identity.

The Company reserves the right, at any time, to request additional documents as deemed necessary e.g., information on origin and source of funds, financial status, experience, education and to verify the identity of the client by using electronic verification.

3.3 Bank Account Requirements

All the Company's account holders MUST have a valid bank or credit / debit card account in their name.

The bank statement should show their name, IBAN and the same registered address as their application.

4. Anti-Money Laundering Policy Details

The Company monitors funding from various bank accounts outside of the account holder's home country.

The Company neither accepts cash deposits nor disburses cash under any circumstances.

The Company does not accept third-party deposits of any kind.

The Company matches each deposit to the account name on file for that customer.

The Company reserves the right to refuse processing a transaction at any stage where it believes the transaction to be connected in any way to money laundering or criminal activity. In accordance with international law, the Company is not obligated to inform the client if suspicious activity is reported to any corresponding regulatory or legal bodies.

5. Account Opening Procedures

Stryk is a trading name of BUX Europe Limited, a company registered in Cyprus under registration number HE 350475. BUX Europe Limited is authorized and regulated by the Cyprus Securities and Exchange Commission, under license number 374/19.

Prior to opening an account, the Company shall document the identity, nature of business, income, net wealth, the anticipated account turnover, the nature of the transactions, the expected origin of incoming funds to be credited in the account, the expected destination of outgoing transfers/payments, source of funds, and investment objectives of each prospective customer.

6. Funds Deposit Procedure

The deposit procedure of the Company detailed below follows the strict principle that ensures funds are received from the bank account or credit / debit card, issued on client's name bearing the same address, confirmed during onboarding.

The first payment of the operations is carried out through an account opened in the customer's name with a credit institution operating and licensed in a country in the European Economic Area or third country, which is categorized by the Company as lower risk after taking into account the Joint Guidelines and the Appendix II of the AML Law.

7. Funds Withdrawal Procedure

The withdrawal procedure of the Company detailed below follows the strict principle that ensures funds are securely remitted back to their originating source.

The Company's customers will be able to make withdrawal funds electronically by logging in to their trading account or by contacting customer services via email for bank wires.

The withdrawal request will be received directly to the Back Office department for processing.

The Back Office department will confirm the account balance, verify that there are no holds or withdrawal restrictions on the account, and then approve the withdrawal request, pending Finance Department's approval.

The Company's Anti Money Laundering Compliance department reviews all withdrawal requests approved by the Back Office department, verifying that the original funds are being withdrawn through the same method of deposit and to the name of the account holder on file.

The Anti Money Laundering Compliance department will also examine the withdrawal request against the customer's deposit history to ensure there is no suspicious activity, and if none verifies the bank account details held on file.

Withdrawal requests approved by the Company's Anti Money Laundering Compliance department are sent back to the Back Office department, approved by the Finance department and the funds are released to the client.

If a withdrawal is flagged for suspicious activity, the withdrawal is placed on hold, pending further investigation by the Company's AML Compliance Officer and the Management.

The Company's AML Compliance Officer will decide if further action is needed and which, if any, relevant regulatory bodies need to be contacted.

8. AML Compliance Footnote

The compliance procedure related to AML listed above is only a brief summary of the compliance function guidelines followed by the Company's Anti Money Laundering Compliance Department. A detailed copy of our Prevention of Money Laundering & Terrorist Financing Manual ("AML Manual") is available for qualified institutions, regulatory bodies, and related counterparties. For additional questions concerning the Company's policies, please contact our Anti Money Laundering Compliance Department. No substitutions or modifications will be accepted to the requirements above. The Company's Anti Money Laundering Compliance Department reserves the final determination regarding the validity of these documents.

Clients should assume that all information provided to the Company is available to the competent regulatory authorities in

- (a) the country of incorporation of the Company, i.e., the Republic of Cyprus;
- (b) the country of origin of any funds transmitted to the Company; and
- (c) the destination country of any funds refunded by or withdrawn from the Company.

The Company does not want your business if your funds are sourced from criminal activities or if the

nature of your account transactions is illegal in any manner whatsoever.

The Company reserves the right to review and/or amend its Anti Money Laundering Policy, at its sole discretion, whenever it deems fit or appropriate.

Our AML Policy is a policy, part of our Terms and Conditions of Business and is contractually binding.

9. Monitor And Review

The Company will, on a regular basis, monitor and assess the effectiveness of this Policy in order to deliver the best possible service for the Client, and, where appropriate, the Company reserves the right to correct any deficiencies in this Policy and make improvements to it.

In addition, the Company will review the Policy at least annually. A review will also be carried out whenever a material change occurs that affects the ability of the Company to continue to provide the best possible investment services to its Client.

10. Client Consent

The Company is required, when establishing a business relationship with the Customer, to obtain his / her prior consent to this Policy.