

AML Policy – Solitaire Prime Ltd.

1.0 Introduction

Solitaire Prime Ltd. is fully committed to combating money laundering, terrorist financing, and other financial crimes. The Company has adopted strict internal policies and procedures designed to detect, mitigate, and prevent any suspicious activities associated with its services or clients. Solitaire Prime Ltd. continuously monitors its exposure to AML risk and upholds the principles of integrity, accountability, and regulatory compliance.

We believe that understanding our clients thoroughly enables us to effectively manage risks, ensure compliance, and report any unusual or suspicious activity to relevant authorities as required under applicable laws and regulations.

2.0 Know Your Customer (KYC) & Client Due Diligence (CDD) Policy

2.1 Client Due Diligence (CDD)

CDD is a fundamental process whereby the Company must:

- a. Confirm the true identity of clients.
- b. Verify whether the client is acting on behalf of another party.
- c. Confirm that there are no legal or sanctions-related barriers to servicing the client.
- d. Understand the nature of the client's business and expected activity.
- e. Assist regulatory or law enforcement bodies with any investigations, where applicable.

CDD measures include:

- Identifying and verifying the client's identity.
- Identifying and verifying the Ultimate Beneficial Owner (UBO).
- Gathering information on the purpose and intended nature of the business relationship.

2.2 Know Your Customer (KYC)

The KYC process is central to assessing the legitimacy of our clients and preventing financial crime. This includes identity verification and background screening based on international AML standards.

For Natural Persons:

- Full Name
- Date of Birth
- Nationality
- Residential Address
- Origin of Funds
- Occupation and Employer Name

Documents Required:

- Valid government-issued photo ID (passport, national ID, or driver's license)
- Proof of address (utility bill, bank statement, or similar – not older than 3 months)

For Legal Entities:

- Company Name
- Incorporation Number and Date
- Country and Registered Address
- Ownership Structure, Shareholders, and Beneficial Owners
- Directors' Proof of Identity

Documents Required:

- Certificate of Incorporation
- Memorandum & Articles of Association
- Proof of registered address
- Board Resolution authorizing the account
- ID and address proof of directors and UBOs

Failure to provide complete or accurate KYC documentation may lead to account suspension or denial of services.

3.0 Transaction Monitoring

Solitaire Prime Ltd. implements robust transaction monitoring systems that review client activity for suspicious patterns or inconsistencies. Our systems incorporate automated tools and manual oversight to detect red flags such as:

- Unusually large transactions
- Rapid movement of funds
- Inconsistencies with stated customer profiles
- Transactions from high-risk jurisdictions

Where suspicious activity is identified, Solitaire Prime Ltd. will:

- Freeze the transaction or account (if necessary)
- Conduct internal investigations
- Submit a Suspicious Transaction Report (STR) to the appropriate regulatory authority

In cases of confirmed fraud or money laundering, client accounts may be closed, and funds forfeited in accordance with legal procedures.

4.0 Record Keeping

All client-related documents, identification data, transaction records, and STR filings are securely stored and retained for at least 5 years after the termination of the business relationship. These records are available to competent authorities upon lawful request.

5.0 Training and Awareness

All staff members of Solitaire Prime Ltd., particularly those in compliance and client-facing roles, are trained on AML/KYC regulations and internal policies. Regular refresher courses and updates are provided to ensure ongoing awareness of emerging risks and regulatory expectations.

6.0 Policy Review and Updates

This AML Policy is reviewed and updated regularly to remain in alignment with evolving laws, regulatory guidelines, and industry best practices. Solitaire Prime Ltd. reserves the right to amend this policy without prior notice, where required by law or internal compliance standards.

7.0 Contact

For questions related to AML compliance or to report suspicious activity, please contact:

Email: info@solitaireprime.com

Registered Address: Ground floor, The Sotheby Building, Rodney Village, Rodney Bay, Gros-Islet, Saint Lucia.