



Exo Capitals

Professional Compliance

EXO CAPITALS — CORPORATE COMPLIANCE FRAMEWORK (Professional Edition)

1. INTRODUCTION

This Compliance Framework outlines EXO Capitals' commitment to regulatory integrity, ethical conduct,

and operational transparency. It provides internal standards to ensure all business practices align with

international financial compliance expectations.

2. CORPORATE GOVERNANCE

- Board oversight on compliance, risk, and operational controls.
- Mandatory annual governance review.
- Independent compliance reporting structure.

3. ANTI-MONEY LAUNDERING (AML) POLICY

- Customer identity verification and enhanced due diligence.
- Ongoing monitoring of customer behavior and transactional activity.
- Suspicious transaction identification, logging, and mandatory reporting.

4. KNOW YOUR CUSTOMER (KYC) FRAMEWORK

- Verification of identity, address, and financial suitability.
- Categorization of customers based on risk tiers.
- Continuous update of KYC documents and tracking validity.

5. RISK MANAGEMENT POLICY

- Identification, assessment, and control of operational risks.
- Quarterly risk assessments with documented reporting.
- Escalation protocols for high-severity incidents.

6. DATA PROTECTION & PRIVACY POLICY

- Secure collection, processing, and storage of client data.
- Access controls and encryption for sensitive information.
- Mandatory reporting in the event of data breaches.

7. OPERATIONAL COMPLIANCE STANDARDS

- Internal controls for trade execution, reporting, and communication.
- Staff training requirements and annual certification.
- Process audits to ensure adherence to company policies.

8. COMPLAINT HANDLING PROCEDURE

- Efficient customer complaint logging and tracking system.
- Transparent resolution framework within defined timelines.
- Documentation of all interactions and resolution steps.

9. CODE OF CONDUCT

- Professional behavior and ethical expectations for all employees.
- Confidentiality obligations and conflict-of-interest disclosures.

- Zero tolerance for misconduct or regulatory breaches.

10. REGULATORY REPORTING & AUDIT

- Timely submission of reports as required by the relevant authorities.
- External and internal audits to evaluate compliance performance.
- Implementation of corrective action plans when necessary.

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