



B2B PRIME SERVICES BAHAMAS

AML & CTF STATEMENT

1. INTRODUCTION

B2B Prime Services Bahamas Limited (the “Company”) is incorporated in the Commonwealth of The Bahamas and is authorized and regulated by the Securities Commission of The Bahamas (SCB) under the Securities Industry Act, 2011 (SIA) and the Digital Assets and Registered Exchanges Act, 2024 (DARE Act). The Company maintains a zero-tolerance policy towards money laundering (AML), terrorist financing (CTF) and proliferation financing (CPF). Our compliance framework aligns with the Bahamian AML/CFT/CPF regime, including, without limitation: the Proceeds of Crime Act; the Financial Transactions Reporting Act (FTRA) and Regulations; the Anti-Terrorism Act; the Financial Intelligence Unit Act; and applicable SCB Rules, Guidance Notes and Notices. Where relevant, the Company also adheres to international standards issued by the FATF and IOSCO.

2. RISK-BASED APPROACH

The Company maintains a documented Business-Wide Risk Assessment (BWRA) and applies a risk-based approach to identify, assess, mitigate and monitor ML/TF/CPF risks. Client onboarding is governed by a Client Acceptance Policy that prohibits high-risk or non-compliant relationships and sets out risk criteria for jurisdictions, products, delivery channels and customer types. Controls are proportionate to residual risk and are reviewed periodically by senior management.

3. CUSTOMER DUE DILIGENCE (CDD) AND MONITORING

The Company performs Customer Due Diligence (CDD) prior to establishing a business relationship and on an ongoing basis. Enhanced Due Diligence (EDD) is applied to Politically Exposed Persons (PEPs) and other higher-risk relationships; Simplified Due Diligence (SDD) may be used where permitted by law. The scope of due diligence includes verification of identity, beneficial ownership and controlling persons, purpose and intended nature of the relationship, and source of funds/wealth where applicable. All relationships are subject to ongoing monitoring commensurate with the customer’s risk profile, including periodic reviews and scrutiny of transactions to ensure they are consistent with our knowledge of the customer.

4. SANCTIONS AND COUNTER-PROLIFERATION FINANCING (CPF)

The Company screens customers, beneficial owners, connected parties and transactions against applicable targeted financial sanctions lists (including United Nations Security Council lists implemented in The Bahamas, domestic lists, and other lists where relevant). The Company complies with Bahamian Targeted Financial Sanctions obligations, including immediate freezing and reporting measures, and implements controls to prevent proliferation financing in accordance with national laws and FATF recommendations.



5. DETECTION AND REPORTING

We maintain risk-sensitive monitoring tools and escalation procedures. Alerts are reviewed by Compliance and, where appropriate, escalated to the Money Laundering Reporting Officer (MLRO). The MLRO determines whether to file Suspicious Transaction Reports (STRs) or Suspicious Activity Reports (SARs) with the Bahamas Financial Intelligence Unit (FIU). Regulatory notifications to the SCB are made as required by law and license conditions.

6. GOVERNANCE AND TRAINING

The Board of Directors and Senior Management oversee the AML/CFT/CPF framework and ensure adequate resources. The MLRO is responsible for day-to-day implementation, investigations and FIU liaison. All relevant staff receive induction and periodic training proportionate to their roles, with records maintained. The framework is subject to independent review and testing at least annually or as otherwise required.

7. RECORD KEEPING AND DATA PROTECTION

Client identification data, CDD/EDD files, transaction records, STR/SAR documentation and training records are retained in accordance with Bahamian legal requirements (typically for a minimum of five (5) years from the end of the relationship or the date of the transaction, as applicable) and any longer period required by the SCB. Personal data processed for AML purposes is handled lawfully and securely, in line with applicable Bahamian data protection law and the Company's Privacy Policy.

8. CONTACT

For confidential AML/CTF/CPF-related queries or reports, please contact the Money Laundering Reporting Officer (MLRO): mlro@b2prime.com