LEFTURN INC.

ANTI-MONEY LAUNDERING & COUNTER-TERRORISM FINANCING POLICY

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1 INTRODUCTION & POLICY OVERVIEW

LEFTURN Inc. (hereinafter "LEFTURN" or "the Company") is committed to maintaining the highest standards of legal and ethical conduct in all its operations. The Company recognizes that money laundering and the financing of terrorism represent serious threats to the integrity of global financial markets, the stability of the financial system, and the communities in which we operate.

This Anti-Money Laundering and Counter-Terrorism Financing Policy Manual (hereinafter "the Manual" or "the Policy") sets out the framework, procedures, and obligations that LEFTURN and all of its personnel must follow to prevent the Company's services from being used for money laundering, terrorist financing, fraud, or any other financial crime.

This Policy has been fully revised and updated for 2026 to reflect current Canadian federal legislation, FATF's revised 40 Recommendations, the EU's 6th Anti-Money Laundering Directive (6AMLD), and global best practices in AML/CFT compliance.

Policy Objectives

- Establish robust internal controls, policies, and procedures to detect and prevent money laundering and terrorist financing.
- Ensure full compliance with all applicable anti-money laundering and counter-terrorism financing legislation in Canada and internationally.
- Implement rigorous Know Your Customer (KYC) and Customer Due Diligence (CDD) procedures for all clients.
- Provide a clear framework for identifying, investigating, and reporting suspicious transactions to the appropriate authorities.
- Maintain comprehensive records in accordance with statutory retention requirements.
- Foster a culture of compliance through ongoing staff training and awareness programs.
- Ensure the Company is never used — knowingly or unknowingly — as a vehicle for financial crime.

Scope of Application: This Policy applies to LEFTURN Inc., all of its directors, officers, employees, contractors, and agents worldwide. Adherence to this Policy is mandatory. Non-compliance may result in disciplinary action up to and including termination of employment or engagement, and may be referred to regulatory or law enforcement authorities.

2 LEGAL & REGULATORY FRAMEWORK

LEFTURN operates in accordance with an extensive body of international and Canadian anti-money laundering and counter-terrorism financing legislation and guidance. The key regulatory instruments governing this Policy include:

Canadian Federal Legislation

- **Proceeds of Crime (Money Laundering) and Terrorist Financing Act (PCMLTFA)**: Canada's primary AML/CFT legislation, as amended, setting out reporting, record-keeping, and compliance program obligations for all financial entities.
- **PCMLTFA Regulations (SOR/2002-184 and related)**: Detailed regulations prescribing KYC requirements, large cash transaction reporting, electronic funds transfer reporting, suspicious transaction reporting, and beneficial ownership obligations.
- **Financial Transactions and Reports Analysis Centre of Canada (FINTRAC) Guidelines**: Authoritative guidance issued by Canada's financial intelligence unit, which LEFTURN is required to follow for all AML/CFT compliance obligations.
- **Criminal Code of Canada — Sections 462.31, 83.02–83.04**: Establishes criminal offences for money laundering, terrorist financing, and related activities.
- **Terrorist Financing Act (S.C. 2001, c. 41)**: Prohibits the financing of terrorism and requires entities to freeze assets and report any dealings with listed persons or entities under UN Security Council resolutions.
- **Office of the Superintendent of Financial Institutions (OSFI) AML/ATF Guidelines**: Supplementary guidance applicable to financial service providers operating in Canada.

International Standards & Frameworks

- **Financial Action Task Force (FATF) — 40 Recommendations (2023 Revision)**: The global standard for AML/CFT compliance. LEFTURN aligns its policies with all applicable FATF Recommendations, including the 2023 updates on virtual assets, beneficial ownership, and risk-based approaches.
- **FATF Special Recommendations on Terrorist Financing**: Nine special recommendations addressing the detection and prevention of terrorist financing globally.
- **EU 6th Anti-Money Laundering Directive (6AMLD — Directive 2018/1673/EU)**: Applicable to international operations involving EU-resident clients, expanding criminal liability for money laundering and requiring enhanced due diligence.
- **UN Security Council Resolutions 1267, 1373, and subsequent resolutions**: Requiring the freezing of assets and prohibition of transactions with designated individuals and entities listed by the UN.
- **Wolfsberg Group Principles (2023)**: Industry best practice guidelines for AML risk management, correspondent banking, and private banking due diligence.
- **Basel Committee on Banking Supervision — Customer Due Diligence Guidelines**: International guidance on sound KYC practices and risk-based approaches to AML/CFT compliance.
- **OFAC — U.S. Office of Foreign Assets Control Sanctions Lists**: LEFTURN screens all clients against OFAC sanctions lists as part of its global sanctions compliance program.

3 DEFINITIONS

For the purposes of this Policy, the following definitions apply:

Money Laundering (ML)

The process by which funds derived from criminal activity are made to appear legitimate. The process typically involves three stages: (1) Placement — introducing illicit funds into the financial system; (2) Layering — concealing the origin through complex transactions; and (3) Integration — reintroducing laundered funds into the legitimate economy.

Terrorist Financing (TF)

The collection or provision of funds, by any means, directly or indirectly, with the knowledge or intention that such funds will be used, in whole or in part, to carry out a terrorist act or to support a terrorist organization or individual terrorist.

Know Your Customer (KYC)

The mandatory process by which LEFTURN identifies and verifies the identity of clients and assesses the nature and purpose of their business relationship with the Company.

Customer Due Diligence (CDD)

The process of gathering and verifying information about a customer to assess their risk profile and the legitimacy of the business relationship. CDD includes Standard CDD, Simplified CDD, and Enhanced Due Diligence (EDD).

Enhanced Due Diligence (EDD)

Heightened KYC and monitoring measures applied to clients classified as higher risk, including Politically Exposed Persons (PEPs), clients from high-risk jurisdictions, and clients engaged in higher-risk activities.

Politically Exposed Person (PEP)

An individual who holds or has held a prominent public function, including heads of state, senior government officials, senior judicial officials, senior military officials, senior executives of state-owned enterprises, and senior political party officials. PEPs include their immediate family members and known close associates. Foreign PEPs are automatically classified as high risk.

Beneficial Owner

The natural person(s) who ultimately owns or controls a legal entity and/or on whose behalf a transaction is conducted, including any person who directly or indirectly holds 25% or more of the capital or voting rights of a legal entity, or who otherwise exercises effective control over it.

Suspicious Transaction

Any transaction or attempted transaction that the Company has reasonable grounds to suspect is related to money laundering, terrorist financing, or the commission of a designated offence, regardless of the amount involved.

Suspicious Transaction Report (STR)

A formal report filed with FINTRAC (in Canada) or the relevant financial intelligence unit in other jurisdictions when the Company has reasonable grounds to suspect a transaction is linked to financial crime.

Compliance Officer (CO)

The designated individual at LEFTURN responsible for overseeing and implementing the Company's AML/CFT compliance program and reporting obligations.

FINTRAC

The Financial Transactions and Reports Analysis Centre of Canada — Canada's financial intelligence unit to which certain mandatory reports must be submitted.

Sanctions

Legal or regulatory restrictions imposed by governments or international bodies (e.g., the United Nations, OFAC, Global Affairs Canada) that prohibit or restrict dealings with designated persons, entities, or jurisdictions.

High-Risk Jurisdiction

A country or territory identified by FATF as subject to a call for action or increased monitoring due to strategic deficiencies in its AML/CFT framework, or identified by applicable regulatory authorities as posing heightened ML/TF risks.

4 COMPANY IDENTIFICATION

Legal Name:	LEFTURN Inc.
Registered Office:	393 University Avenue, Toronto, Ontario, M5G 2M2, Canada
Principal Office:	Miami, Florida, USA (Operational HQ)
Corporate Registration:	005002593
LEI:	5493007Q1N3GZ2UNWC50
Business Purpose:	Managed forex account services, algorithmic trading strategy development, forex copy trading, and related financial technology services.
Primary Website:	manage.forex
Email:	info@manage.forex
Telephone:	1-800-538-3856 (Toll-Free)
Compliance Contact:	compliance@manage.forex
Policy Version:	3.0 — Effective June 17, 2026

5 CUSTOMER IDENTIFICATION & KNOW YOUR CUSTOMER (KYC)

LEFTURN's KYC program is central to its AML/CFT compliance framework. KYC is not a one-time exercise; it is a dynamic, ongoing process that continues throughout the entire client relationship. The Company collects, verifies, and monitors customer information to ensure that our services are not exploited for illicit purposes.

5a. Customer Acceptance Policy

LEFTURN operates a risk-based approach to customer acceptance. Before entering into a business relationship with any person or entity, the Company assesses whether the prospective client meets our eligibility criteria and poses an acceptable level of risk.

Prohibited Customers — LEFTURN will not accept as clients:

- Persons or entities appearing on any applicable sanctions list (OFAC SDN, UN Consolidated List, Global Affairs Canada, EU Consolidated Sanctions List, or any other applicable list);
- Anonymous individuals, persons using pseudonyms, or those whose identity cannot be satisfactorily verified;
- Shell companies with no legitimate business purpose, opaque ownership structures, or where the ultimate beneficial owner(s) cannot be identified;
- Persons or entities from FATF-designated high-risk jurisdictions subject to a call for action, including countries subject to comprehensive sanctions;
- Persons with known or suspected involvement in criminal activity including drug trafficking, fraud, corruption, organized crime, or terrorism;
- Unlicensed money service businesses, unauthorized casinos or gambling operators, or similar unregulated financial intermediaries;
- Persons who refuse to provide required identification, documentation, or information without a reasonable explanation;
- Persons providing documentation that is fraudulent, altered, expired, or otherwise of doubtful authenticity.

Customers Requiring Prior Compliance Officer Approval:

- Politically Exposed Persons (PEPs) and their immediate family members and close associates;
- Clients from jurisdictions identified as elevated risk by FATF or the Company's internal risk assessment;
- Clients engaged in activities presenting elevated inherent ML/TF risk, including defense contractors, precious metals/gemstone dealers, real estate professionals, or high-value asset dealers;
- Non-profit organizations or charities, particularly those with international operations in high-risk regions;
- Clients seeking to invest unusually large amounts relative to their stated financial profile.

5b. Risk Classification

LEFTURN classifies all clients as Low, Medium, or High Risk based on a comprehensive assessment of the following risk factors:

Risk Category	Criteria	Due Diligence Level
LOW RISK	• Resident in low-risk FATF-compliant jurisdiction • Verified employment/source of funds • Consistent transaction profile • No adverse media or PEP status	Standard CDD Annual review

MEDIUM RISK	• Non-resident or dual residency • Elevated-risk industry (legal, accounting, etc.) • Moderate transaction volumes • Third-party intermediary involvement	Standard CDD + Enhanced Monitoring Semi-annual review
HIGH RISK	• PEP or close associate • High-risk jurisdiction connection • Complex ownership structure • Inconsistent transaction patterns • High transaction volumes • Adverse media hits	Enhanced Due Diligence (EDD) Quarterly review Senior approval required

5c. Customer Due Diligence (CDD) & Enhanced Due Diligence (EDD)

Standard CDD — Required for all clients:

- Full legal name (and any aliases or former names);
- Date of birth (for individuals) or date of incorporation/registration (for legal entities);
- Residential address or registered office address;
- Government-issued photo identification document (passport or national ID card) — must be current, unexpired, and readable;
- Proof of current address issued within the past 3 months (utility bill, bank statement, or government correspondence);
- For legal entities: Certificate of Incorporation, Memorandum and Articles of Association, Register of Directors, and evidence of registered address;
- Beneficial ownership information for any legal entity — identity and verification of all natural persons holding 25%+ of ownership or control;
- Stated purpose of the account and anticipated transaction volumes;
- Source of funds — documented evidence of how the funds to be invested or traded were generated.

Enhanced Due Diligence (EDD) — Required for High Risk clients:

- All standard CDD documentation, plus:
- Additional documentary evidence of source of wealth (e.g., tax returns, audited financial statements, inheritance documentation, property sale agreements);
- Enhanced scrutiny of the purpose and intended nature of the business relationship;
- Senior management approval before onboarding or continuing the relationship;
- More frequent transaction monitoring and periodic re-evaluation (at minimum quarterly);
- For PEPs: written approval from the Compliance Officer and Board before onboarding; identification of any PEP status at outset and ongoing screening.

5d. Registration & Verification Process

All prospective clients must complete the following registration process before any managed forex account services are activated:

- **Step 1 — Application Submission**

  The prospective client completes LEFTURN's Investor Application form at manage.forex/apply, providing all required personal information, broker account details, and account credentials.

- **Step 2 — Identity Verification**
  LEFTURN verifies the applicant's identity through secure digital document submission. Accepted documents include: (a) valid passport; (b) national identity card; (c) government-issued driver's licence. Documents must be current, unexpired, and clearly legible. Verification is completed via secure document upload and, where required, via video identification using an approved video conferencing platform (Zoom, Google Meet, or equivalent).
- **Step 3 — Address Verification**
  The applicant must provide at least one current proof-of-address document dated within the past three months: bank statement, utility bill, government-issued correspondence, or equivalent.
- **Step 4 — Source of Funds Declaration**
  Applicants must declare and provide documentary evidence of the source of funds to be deposited, including employment income, business income, investment returns, or other legitimate sources.
- **Step 5 — Sanctions & Watchlist Screening**
  LEFTURN screens all applicants against applicable sanctions lists and watchlists prior to approval, including OFAC SDN, UN Consolidated List, Global Affairs Canada, and EU consolidated sanctions lists.
- **Step 6 — Risk Assessment & Compliance Officer Review**
  The Compliance Officer reviews the completed application, assigns a risk rating, and approves or declines the account. High-risk accounts require additional documentation and Board approval.
- **Step 7 — Agreement Execution**
  Upon approval, the client executes LEFTURN's Management Agreement and Limited Power of Attorney (LPOA) digitally. Services are activated only after all agreements are fully executed.

5e. Transaction Limits

LEFTURN maintains the following transaction thresholds. Clients wishing to exceed these limits must submit a written request to compliance@manage.forex and provide additional supporting documentation:

Account Type	Daily Deposit/Withdrawal Limit	Monthly Limit	Requires Approval Above
Individual (Verified)	$25,000 USD	$150,000 USD	$10,000 USD single transaction
Corporate (Verified)	$250,000 USD	$2,500,000 USD	$50,000 USD single transaction
High Net Worth Individual	Negotiated	Negotiated	All transactions monitored

■ FINTRAC Mandatory Reporting: LEFTURN is required to file a Large Cash Transaction Report (LCTR) with FINTRAC for any single cash transaction of CAD $10,000 or more. Electronic Funds Transfer Reports (EFTRs) must be filed for international electronic funds transfers of CAD $10,000 or more. These obligations apply regardless of the client's risk classification.

5f. Sanctions Screening

LEFTURN maintains a rigorous sanctions screening program. All prospective and existing clients are screened against the following watchlists and sanctions databases:

- OFAC Specially Designated Nationals and Blocked Persons List (SDN List)
- UN Security Council Consolidated Sanctions List
- Global Affairs Canada Consolidated Autonomous Sanctions List
- European Union Consolidated Sanctions List

- FATF High-Risk and Other Monitored Jurisdictions
- UK HM Treasury Financial Sanctions List
- World Bank Debarred Parties List
- Politically Exposed Persons (PEP) databases
- Adverse media and negative news databases

Screening is conducted at onboarding and on an ongoing basis. Any match triggers an immediate freeze of activities and review by the Compliance Officer. Confirmed matches will result in account termination and a mandatory Suspicious Transaction Report to FINTRAC.

5g. Ongoing Monitoring & Information Updates

"Know Your Customer" is a continuous obligation. LEFTURN maintains ongoing monitoring of all client accounts and transaction activity throughout the duration of the relationship. Client information and documentation must be kept current and is subject to periodic review:

- **Low Risk clients**: Annual review of KYC documentation and account activity
- **Medium Risk clients**: Semi-annual review
- **High Risk clients / PEPs**: Quarterly review and enhanced ongoing monitoring
- **All clients**: Immediate review triggered by: (a) material changes in transaction patterns; (b) adverse media hits; (c) changes in sanctions status; (d) client notification of changed circumstances; (e) regulatory request

6 MONITORING POLICY & SUSPICIOUS TRANSACTION REPORTING

6a. Definition of a Suspicious Transaction

A Suspicious Transaction is any transaction (completed or attempted) that gives LEFTURN reasonable grounds to suspect it is related to the commission of a money laundering offence, a terrorist activity financing offence, or any other designated offence, regardless of the amount involved. Suspicion is based on an objective assessment of all available information — it does not require certainty or proof.

6b. Red Flag Indicators

The following non-exhaustive list of indicators may signal suspicious activity. Staff must report any of the following to the Compliance Officer immediately:

Customer Behavior:

– Reluctance to provide required documentation or information without reasonable explanation
– Providing inconsistent, false, or contradictory information
– Unusual nervousness or excessive concern about record-keeping and reporting obligations
– Requests to conduct transactions in ways that avoid normal documentation
– Unexplained changes in financial profile or sudden, significant changes in account activity

Transaction Patterns:

– Transactions inconsistent with the client's stated financial profile, investment purpose, or previous activity
– Multiple transactions just below reporting thresholds (structuring)
– Rapid and frequent movement of funds with no apparent legitimate investment purpose
– Deposits from or withdrawals to third-party accounts not belonging to the client
– Unusually large single transactions relative to account history
– Transactions involving jurisdictions identified as high-risk by FATF

Source of Funds:

– Inability or unwillingness to provide a credible explanation for the source of large amounts
– Source of funds inconsistent with client's known profession or business activity
– Funds originating from cash-intensive businesses without adequate supporting documentation
– Suspicious wire transfers from multiple unrelated third parties

6c. Internal Reporting Procedure

Any LEFTURN personnel who identifies or suspects suspicious activity must follow this procedure:

- **Step 1 — Internal Report**

  The employee must immediately complete an Internal Suspicious Activity Report (ISAR) and submit it to the Compliance Officer. Under no circumstances should the employee inform the client or any third party that a report is being made — this constitutes "tipping off" and is a criminal offence.

- **Step 2 — Compliance Officer Investigation**

  The Compliance Officer investigates the report within 5 business days. The investigation includes a review of all available client documentation, transaction history, and any other relevant information. The Compliance Officer may request additional documentation from the client without disclosing the reason.

- **Step 3 — Committee Review**

  The AML/CFT Committee reviews the Compliance Officer's findings and determines whether reasonable grounds exist to file a Suspicious Transaction Report (STR) with FINTRAC.

- **Step 4 — STR Filing**

  If the Committee determines reasonable grounds exist, the Compliance Officer files a Suspicious Transaction Report (STR) with FINTRAC as soon as practicable after forming the suspicion — and not later than 30 days after the transaction. The STR is completed in accordance with FINTRAC's reporting requirements.

- **Step 5 — Account Action**

  Depending on the nature and severity of the suspicion, the Company may suspend transaction processing on the account pending the outcome of the investigation. In cases involving serious suspicion of criminal activity, the account may be terminated and law enforcement notified.

- **Step 6 — Documentation & Archiving**

  All documentation relating to the investigation, Committee deliberations, and STR filing are retained for a minimum of 10 years from the date of the report, in accordance with PCMLTFA retention requirements.

■ TIPPING OFF PROHIBITION: It is a serious criminal offence under the PCMLTFA and the Criminal Code of Canada to disclose, directly or indirectly, that a suspicious transaction report has been or may be made to FINTRAC, or to reveal the content of such a report. Violation may result in criminal prosecution and imprisonment. All personnel are strictly prohibited from notifying any person involved in or connected to a suspicious transaction that they have been reported to FINTRAC.

6d. FINTRAC Mandatory Reporting Obligations

- **Suspicious Transaction Reports (STRs)**: Filed when there are reasonable grounds to suspect a transaction is related to ML/TF. Must be filed as soon as practicable after forming reasonable grounds to suspect, and no later than 30 calendar days.
- **Large Cash Transaction Reports (LCTRs)**: Required for any receipt of CAD $10,000 or more in cash (or equivalent) in a single transaction or within a 24-hour period from the same person. Must be filed within 15 calendar days.
- **Electronic Funds Transfer Reports (EFTRs)**: Required for international electronic funds transfers of CAD $10,000 or more. Must be filed within 5 business days.
- **Terrorist Property Reports (TPRs)**: Filed immediately upon knowledge or reasonable grounds to believe that property in LEFTURN's control is owned or controlled by a terrorist or terrorist group, or will be used for terrorism.

7 RECORD KEEPING

LEFTURN maintains comprehensive records of all client information, transactions, and compliance activities in accordance with the PCMLTFA and applicable international requirements. All records are stored securely with access restricted to authorized personnel only.

7a. Retention Requirements

Record Type	Retention Period	Starting From
KYC & Customer Identification Documents	10 years	End of business relationship
Transaction Records	10 years	Date of transaction
Suspicious Transaction Reports (STRs)	10 years	Date of report filing
Large Cash Transaction Reports (LCTRs)	10 years	Date of report filing
Electronic Funds Transfer Reports (EFTRs)	10 years	Date of report filing
AML/CFT Training Records	10 years	Date of training
Compliance Officer Appointment Records	10 years	End of appointment
Internal Investigation Files	10 years	Date of investigation closure
Client Correspondence	7 years	Date of correspondence

7b. Storage & Security

- All records are stored in LEFTURN's secure, encrypted database accessible exclusively via the Company's internal VPN with multi-factor authentication;
- Physical documents are stored in locked, fire-resistant filing systems at the Company's principal offices;
- Access to client records is strictly limited to authorized personnel on a need-to-know basis;
- All records are maintained in a format that allows for rapid retrieval in the event of a request from FINTRAC, a law enforcement authority, or a court order;
- Regular automated backups are maintained at separate, secure off-site locations;
- Data destruction protocols ensure records are securely deleted or shredded upon expiry of the applicable retention period.

8 STAFF TRAINING POLICY

LEFTURN recognizes that a well-informed, compliance-aware workforce is one of the most effective tools in preventing money laundering and terrorist financing. The Company is committed to ensuring that all personnel who may come into contact with clients, transactions, or compliance matters receive appropriate, ongoing training.

8a. Training Requirements

- **Initial Induction Training**

  All new employees, contractors, and agents must complete LEFTURN's AML/CFT induction training program before they begin work or within 30 days of joining. This program covers the legal framework, Company policies, KYC procedures, red flag indicators, and reporting obligations.

- **Annual Refresher Training**

  All personnel must complete annual AML/CFT refresher training covering updates to legislation, regulatory guidance, and Company policies. Training is provided through LEFTURN's internal learning management system.

- **Role-Specific Training**

  Personnel with specific AML/CFT responsibilities (Compliance Officer, account managers, client onboarding staff) receive enhanced role-specific training appropriate to their functions, updated at least annually.

- **Regulatory Updates**

  When material changes occur to applicable legislation or FATF recommendations, LEFTURN will promptly notify all affected personnel and provide updated training within 60 days of the change.

- **Training Records**

  LEFTURN maintains records of all AML/CFT training undertaken by each employee, including training content, dates, and assessment results, retained for a minimum of 10 years.

9 ORGANIZATIONAL STRUCTURE & COMPLIANCE OFFICER

9a. AML/CFT Compliance Committee

LEFTURN has established an AML/CFT Compliance Committee responsible for overseeing the implementation and effectiveness of this Policy. The Committee is composed of:

- At least two members of the Board of Directors (one of whom serves as Committee Chair);
- The Compliance Officer (who serves as the Committee's operational lead);
- The Chief Executive Officer or delegate;
- External legal counsel or compliance advisor, as required.

The Committee meets quarterly as a minimum, and convenes extraordinary meetings when required by circumstances (e.g., a significant STR filing, regulatory inquiry, or material change in the legal/regulatory environment).

9b. Compliance Officer

The Compliance Officer is LEFTURN's designated AML/CFT officer, appointed by and accountable to the Board of Directors. The Compliance Officer's appointment and any changes thereto are reported to FINTRAC within 5 business days in accordance with the PCMLTFA.

The Compliance Officer is responsible for:

- Implementing, maintaining, and updating LEFTURN's AML/CFT compliance program and this Policy;
- Filing all mandatory reports with FINTRAC (STRs, LCTRs, EFTRs, TPRs) accurately and on time;
- Receiving and investigating all internal suspicious activity reports from staff;
- Chairing and reporting to the AML/CFT Compliance Committee;
- Overseeing the KYC and customer due diligence program;
- Conducting or commissioning the annual AML/CFT risk assessment;
- Monitoring regulatory developments and ensuring the Policy remains current;
- Liaising with FINTRAC, law enforcement, and regulators on AML/CFT matters;
- Reporting annually to the Board of Directors on the effectiveness of the compliance program;
- Maintaining and safeguarding all compliance records.

Compliance Officer Contact: compliance@manage.forex | 1-800-538-3856
Address: LEFTURN Inc., 393 University Avenue, Toronto, Ontario, M5G 2M2, Canada

10 INTERNAL CONTROL SYSTEM

LEFTURN employs a multi-layered internal control framework to prevent the Company's platform and services from being misused for financial crime. These controls operate continuously and are reviewed at least annually by the Compliance Officer.

- **Transaction Monitoring**

  All transactions are subject to automated monitoring. The system generates alerts for transactions that: exceed predefined thresholds; exhibit unusual patterns relative to the client's profile; involve jurisdictions identified as high-risk; or match known typologies for money laundering or terrorist financing.

- **Two-Factor Authentication (2FA)**

  All client account access and transaction authorizations require multi-factor authentication to ensure that transactions are initiated by verified, authorized account holders only.

- **Bank Account Verification**

  All deposits and withdrawals are restricted to bank accounts registered in the client's own name. Third-party transfers are not permitted. Any co-owner of a bank account must also complete LEFTURN's KYC process.

- **Sanctions Screening Technology**

  LEFTURN employs industry-standard automated sanctions screening software to screen all clients and counterparties against applicable watchlists in real time. The system is updated daily with the latest sanctions data.

- **Annual Risk Assessment**

  The Compliance Officer conducts a formal, documented AML/CFT risk assessment at least once per year. This assessment evaluates the Company's exposure to ML/TF risks across client types, transaction types, geographies, and delivery channels, and informs updates to this Policy and the compliance program.

- **Independent Compliance Audit**

  LEFTURN's AML/CFT compliance program is subject to independent review or audit at least every two years by a qualified external compliance professional or auditor. Audit findings are reported to the Board and remediation actions tracked by the Compliance Officer.

- **Whistleblower Protection**

  LEFTURN has a formal whistleblower policy protecting any employee who, in good faith, reports a suspected AML/CFT violation internally or to FINTRAC. Retaliation against whistleblowers is strictly prohibited and will result in disciplinary action.

11 DATA PROTECTION & PRIVACY

LEFTURN processes personal data collected for AML/CFT compliance purposes in accordance with applicable privacy legislation, including Canada's Personal Information Protection and Electronic Documents Act (PIPEDA) and, where applicable, the EU General Data Protection Regulation (GDPR).

- Personal data collected for AML/CFT purposes is used exclusively for compliance, legal, and regulatory obligations and is not shared with unauthorized third parties;
- Data is retained for the minimum periods required by law and then securely destroyed;
- All personal data is stored using industry-standard encryption both at rest and in transit;
- LEFTURN will disclose client data to FINTRAC, law enforcement, or other regulatory authorities where required by law or court order — and clients are advised that such disclosure may occur without prior notification to them (consistent with the tipping-off prohibition);
- Clients have the right to access, correct, and (subject to legal retention obligations) request deletion of their personal information by contacting compliance@manage.forex.

12 POLICY REVIEW & AMENDMENTS

This Policy is a living document. It will be formally reviewed and updated at a minimum of once per year by the Compliance Officer, or more frequently in response to:

- Material changes in applicable AML/CFT legislation or regulation;
- Updated FATF Recommendations or guidance;
- New FINTRAC guidance or regulatory communications;
- Significant changes in LEFTURN's business model, client base, products, or services;
- Material findings from internal or external audits or compliance reviews;
- Significant changes in the risk environment.

All amendments to this Policy require approval by the AML/CFT Compliance Committee and the Board of Directors. The updated Policy is distributed to all personnel and replaces all previous versions.

Authorized by the Board of Directors
LEFTURN Inc.

Effective Date: June 17, 2026 Version 3.0

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