

5. AML/CFT/CFPADM Policy (Financial Crime Prevention)

This policy describes the strategic control plan of EXCHANGE TECHNOLOGIES, S.A. DE C.V. to prevent its technological channels from being used for money laundering, the financing of terrorism, or the proliferation of weapons of mass destruction:

- **Risk-Based Approach (RBA):** It establishes that all planning, administration, monitoring, and auditing of the platform is governed by a methodology for the assessment and mitigation of operational, financial, and legal money-laundering-prevention risks.
- **Registered Compliance Office:** EXCHANGE TECHNOLOGIES, S.A. DE C.V. details in its organizational chart the structure of its Compliance Office (Principal and Alternate), which must be duly registered, authorized, and certified before the **Financial Investigation Unit (UIF)** of the Office of the Attorney General of the Republic of El Salvador.
- **Exhaustive Record-Keeping:** The unalterable storage of financial statements, accounting books, balances of assets, liabilities, and equity, and the detailed record of users' transactions is required for a mandatory minimum period of **six (6) years** from the date of the transaction, facilitating audits by the control authorities.
- **Continuous Monitoring and Reporting (STR):** Implementation of real-time blockchain transaction monitoring and screening systems to detect unusual movements and generate the corresponding suspicious transaction reports (STR/ROS) to the UIF.