

ANTI-MONEY LAUNDERING POLICY

The purpose of this Policy is to establish a clear framework for preventing, detecting, and reporting money laundering, terrorist financing, and other financial crimes. It applies to all employees, contractors, and affiliates of Unicorn Capital LLC (“Company”), as well as all clients and counterparties engaged in financial transactions with the Company. This policy supports the Company’s obligation to maintain integrity, protection of client interests, and compliance with applicable laws and international standards.

The Company adheres to all applicable AML regulations and guidelines in every jurisdiction in which it operates. This includes compliance with local laws, international conventions, and guidance issued by regulatory authorities. The Company maintains procedures to identify emerging regulatory requirements and integrates them into operational practices, ensuring that all activities meet legal and ethical standards.

Client Due Diligence (CDD) and Know Your Customer (KYC). All clients undergo a rigorous due diligence process before engagement. This includes:

- i. Verification of identity using reliable, independent documentation such as passports, government-issued IDs, or national identification numbers.
- ii. Verification of residential address through official documents, utility bills, or other accepted proofs.
- iii. Assessment of Source of Wealth (SOW) and Source of Funds (SOF) to confirm the legitimacy of funds being deposited or invested.

Enhanced due diligence is applied to higher-risk clients, including Politically Exposed Persons (PEPs), clients from high-risk jurisdictions, or those engaging in complex or unusually large transactions. This process involves detailed review of financial background, business activities, and potential reputational or legal risks.

Monitoring and Transaction Screening. Transactions are continuously monitored to identify suspicious or unusual activity. Advanced monitoring systems flag anomalies for review by the compliance team. Key indicators include large or unusual transfers, frequent high-value transactions, and patterns inconsistent with the client’s known profile. Screening is conducted against global sanctions lists, PEP databases, and adverse media sources to mitigate exposure to regulatory or reputational risks.

Reporting Obligations. Any suspicious activity identified through monitoring or client interactions is reported to the designated compliance officer. Where required by law, reports are submitted to the relevant regulatory authorities promptly. Employees are

encouraged to report concerns without fear of retaliation, and procedures are in place to maintain confidentiality and protect whistleblowers.

Employee Training and Awareness. All staff undergo comprehensive AML training as part of their onboarding process, with periodic refresher sessions to address regulatory updates and emerging risks. Training programs cover identification of suspicious transactions, compliance responsibilities, KYC procedures, and proper reporting channels. Specialized training is provided to employees with oversight or fiduciary responsibilities.

Record-Keeping and Documentation. Detailed records of client identification, transaction histories, and compliance reviews are maintained in accordance with regulatory requirements. Documentation is stored securely and retained for a minimum period as required by law. These records support internal audits, regulatory inspections, and any investigations into suspicious activity.

Internal Audit and Risk Review. The Internal Audit team conducts regular, risk-based reviews of AML procedures. Audits assess compliance effectiveness, identify gaps, and recommend improvements. Findings are reviewed by Senior Management and the Board of Directors, and corrective actions are implemented to strengthen internal controls and operational resilience.

Third-Party and Correspondent Relationships. Business relationships with third parties, agents, or counterparties are subject to due diligence procedures similar to those applied to clients. The Company assesses potential risks associated with these relationships and implements controls to prevent exposure to illicit activities or regulatory breaches.

Policy Updates and Continuous Improvement. This AML policy is reviewed and updated regularly to address changes in law, regulatory guidance, and industry best practices. Staff and clients are notified of any significant updates, and the Company promotes ongoing vigilance and adaptation to emerging financial crime threats.

Commitment to Ethical Conduct. All personnel of the Company are expected to conduct their duties with careful attention to client funds and in accordance with established procedures to prevent financial crime. Compliance with this policy helps safeguard clients' interests and reinforces the integrity and stability of the financial markets in which the Company conducts business.

Last updated: April 2026