

AML / KYC POLICY

Vinlore Inc. · Anti-Money Laundering & Know Your Customer Policy

Document	AML/KYC Policy
Company	Vinlore Inc.
Reg. No.	IBC-2024-73841-FX
Version	1.0 — May 2026
Reviewed by	Compliance Department

1. PURPOSE & SCOPE

Vinlore Inc. is committed to the highest standards of anti-money laundering (AML) and counter-terrorism financing (CTF) compliance. This Policy applies to all employees, contractors, and agents of the Company, and governs the Company's obligations with respect to all Clients and transactions.

The Company complies with applicable AML/CTF legislation and international standards, including the Financial Action Task Force (FATF) Recommendations.

2. CUSTOMER DUE DILIGENCE (CDD)

Before establishing a business relationship, the Company will verify the identity of all Clients. The following documents are required:

Document Type	Individual	Corporate
Government-issued photo ID	Required	Directors & UBOs
Proof of Address (< 3 months)	Required	Directors & UBOs
Certificate of Incorporation	N/A	Required
Articles of Association	N/A	Required
Register of Directors & Shareholders	N/A	Required
Source of Funds Declaration	Deposits > \$10k	Required

3. ENHANCED DUE DILIGENCE (EDD)

Enhanced Due Diligence is applied to: Politically Exposed Persons (PEPs), clients from high-risk jurisdictions as designated by FATF, clients whose transaction patterns appear unusual or inconsistent with their stated purpose of account, and accounts with cumulative deposits exceeding \$50,000 USD.

EDD may include source of funds/wealth documentation, additional identity verification steps, and senior management approval for onboarding.

4. TRANSACTION MONITORING

The Company employs automated and manual transaction monitoring systems to detect suspicious activity. Indicators of suspicious activity include but are not limited to: large cash-equivalent transactions with no apparent business purpose, rapid movement of funds with no associated trading activity, structuring of transactions to avoid reporting thresholds, and use of multiple accounts to obscure the origin of funds.

All suspicious transactions will be reported to the relevant financial intelligence unit in accordance with applicable law.

5. RECORD KEEPING

The Company retains all KYC documentation and transaction records for a minimum of five (5) years from the date of account closure or the last transaction, whichever is later.

Records are stored securely and are available to regulators and law enforcement upon lawful request.

6. STAFF TRAINING

All staff with client-facing or compliance responsibilities receive mandatory AML/CTF training upon joining the Company and annually thereafter.

The Company's Compliance Officer is responsible for maintaining and updating this Policy and for reporting to senior management.

7. SANCTIONS SCREENING

The Company screens all clients and beneficial owners against international sanctions lists, including OFAC, EU, UN, and HM Treasury lists, at onboarding and on an ongoing basis.

Any match against a sanctions list will result in immediate account suspension pending further review. Funds held in sanctioned accounts may be frozen in accordance with applicable law.