



TERMS OF SERVICE

A background image showing a group of business professionals in a meeting, with a man in a blue shirt smiling in the foreground. The image is semi-transparent and overlaid with a white diagonal band.

# ANTI-MONEY LAUNDERING POLICY

[INFO@MICROSTRATEGYSTRADING.COM](mailto:INFO@MICROSTRATEGYSTRADING.COM)

[HTTPS://WWW.MICROSTRATEGY.COM](https://www.microstrategy.com)

1. The Company provides trading services, including transactions in the financial markets that consequently engage in money. Therefore, the Company has established policies to maintain its international operation lawfully and to comply accordingly with the relevant legislation.
2. The main objective of the Anti-Money Laundering Policy (may also be referred to as “AML Policy”) is to sift unlawful activities such as financial fraud, tax evasion, embezzlement, terrorist financing, and other operations that involve covering the origin of illicitly acquired money.
3. Money laundering is a serious financial crime that invokes the Company’s right to cooperate with the relevant authorities if the Client is proven involved in any laundering operations. By all means, the Company observes a code of conduct, procedures, and policies to detect and prevent any financial crime within its business operations.
4. In compliance with the AML Policy, the Company strictly adheres to its Know-Your-Client Policy (or “KYC Policy”) that verifies that Client’s identity. The Client hereby agrees that he/she will fulfill the obligations in the KYC and AML Policies to persist in legal business operation with the Company. In accordance with the code of conduct, the Company must ensure proper identification of Clients participating in its transactions.
5. As stated in the KYC Policy, the Client must disclose his/her source of funds, which will be used to trade with the Company and submit the indicated documents therein. The Company shall also keep the Client’s records of the financial transactions to track the daily operations. However, for privacy and security reasons, the Company has the right to refuse to provide those records in order to prevent illegal use.
6. By performing transactions with the Company, the Client thereby agrees and authorizes MicroStrategy and its service providers to collect those records. The Company uses the obtained records to audit the Suspicious Transaction Reports submitted to the relevant administration.
7. The Company’s internal audit includes internal control regulations and code of conduct for the application of the Client with due diligence measures, especially if the Client is a politically exposed individual. The internal audit also identifies if the Client resides in a country without ample means for preventing money laundering and terrorist financing, or if the Client is found involved with such. Moreover, other international sanctions imposed on the Client also apply.
8. If the Client’s risk level is low, the Company may simplify its due diligence measures, but will not disregard the relevant procedures entirely. On the other hand, if the Client’s risk level is high, the Company reserves the right to apply additional measures in verifying the Client’s identity and background.
9. In observation with preventing unusual and unlawful transactions, the Company will not enter into operations or establish relationships with anonymous or unidentified users. In the event of transactions performed by a third party on behalf of the Client, the relevant individual must present a power of attorney subject to the Company’s approval. The Company reserves the right to invalidate third-party transactions without notice.
10. The legislation authorizes the Company to waive operations and terminate transactions with any user if he/she does not provide sufficient information or the appropriate documentation. The Company invokes its right to refuse to deal with any individual who does not disclose his/her transaction purpose and other relevant background information.

Trading in the financial market may not be suitable for all investors due to its high level of risk. A high degree of leverage can work against you or for you. You should carefully consider your investment objects, level of experience, and risk appetite before deciding to trade with MicroStrategy. More than 65% of retail investor accounts experience a capital deficit. You should be aware of all the risks associated with trading and seek independent advice if necessary.

11. The Company takes the following cases into account to better prevent illegal financing operations and to assess if the Client has a higher risk level:
- The Company is required to identify if the Client's risk arises from his/her field of activity, including its legal form and management structure, and whether the Client is a part of a civil law partnership or a trust fund.
  - One factor of prevention is identifying if the Client's original or current residency is registered in a territory with a low tax rate, or where the regulations for unlawful financing are not minutely enforced. The Company may also consider countries that cooperate with criminal groups, or whether the criminal groups use the country to pursue operations.
  - The Company reserves the right to tighten verification measures if the transactions with the Client seemed unusual or economically impracticable. These transactions include constant change of information, a rapid increase of capital, and rendering services to anonymous third parties.
  - Stricter measures may be applied if the Client's background provides for the development of weapons-related to mass destruction or any crime, if the Client participates in other operations with cash plays, such as currency exchange locations and gambling operations.
12. Even if the Company knows the Client personally, or the Client or any individual that uses the Company's services is a referral from its employee or representative, the internal procedures and policies must not be disregarded.
13. If the Client has a limited legal capacity, the Company shall evaluate the Client's condition and whether he/she can still use the Company's services. If the Company finds the Client unable to perform the most critical situations, the Company reserves the right to terminate any business relationship immediately.
14. The Company updates the data records and operating profile of the Clients regularly to ensure the validity of each Client's risk level and if the Client is free of criminal records, especially relating to financial activities.

  
**Michael J. Saylor**  
[CEO]



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