

# Capital Chain – Compliance Policies

## 1. Anti-Money Laundering (AML) Policy

### **Policy Statement :**

Capital Chain is committed to preventing money laundering and terrorist financing. This policy applies to all employees, contractors, and business partners. Unwavering compliance with applicable laws and regulations shall serve to safeguard Capital Chain's reputation and uphold public trust in Capital Chain.

Therefore, it is advisable for Capital Chain to establish an anti-money laundering (AML) policy that delineates the prescribed measures to be observed, aiming to ensure the efficient execution of guidelines that support the attainment of overarching organizational goals, while guaranteeing

conformity with the regulatory structure and ensuring compliance with applicable laws and regulations in all jurisdictions where Capital Chain operates.

**Policy Objectives :**

- To establish precise and unambiguous policies for Capital Chain concerning the matters of money laundering, terrorist financing, and the avoidance of sanctions.
- To provide clear and concise explanations of the compliance responsibilities that all employees are obligated to fulfill.
- To offer guidance to employees regarding their daily business activities in alignment with legal requirements.
- To foster a work environment that upholds a culture of adherence to legal regulations in the manner in which employees execute their duties.

**Definition of Money Laundering:**

As per the provisions outlined in Article 2 of the Anti-Money Laundering (AML) Law, the offense of money laundering is defined as the engagement in any of the following activities with the knowledge that the funds involved are derived from a criminal act:

- transfers or moves the proceeds, or disposes of the funds/proceeds intending to conceal or disguise their source
- conceals or disguises the true nature, source or location of the proceeds including the manner of disposal
- acquires, possesses or uses the proceeds on receiving them
- assists the person who committed the felony/misdemeanor to escape punishment.

It is essential to note that money laundering is always an intentional act and cannot be committed through mere negligence. However, Capital Chain acknowledges that acts exhibiting gross negligence, particularly those involving the failure to report suspicions of criminality, may incur criminal liability.

**Laws and Regulations :**

The laws which Capital Chain is subjected to and with which Capital Chain comply:

- UAE Federal Law No. 20 of 2018: Anti-Money Laundering and Combating the Financing of Terrorism and Financing of Illegal Organizations (AML Law).

- Cabinet Resolution No. 10 of 2019: Implementing Regulations of Federal Law No. 20 of 2018 (AML Regulations)
- UAE Federal Law No. 7 of 2014: Combating Terrorism Crimes
- UAE Federal Penal Law No. 3 of 1987 as amended (Penal Code)
- UAE Federal Penal Procedures Law No. 35 of 1992 as amended (Penal Procedures Law)
- UAE Federal Penal Law No. 3 of 1987 as amended (Penal Code) UAE Federal Law No. 5 of 2012: Combating Cyber Crimes
- UAE Federal Law No. 5 of 2012: Combating Cyber Crimes
- SCA Decision (17/R) of 2010 Concerning Anti-Money Laundering and Terrorism Finance Combating Procedures
- UAE Central Bank Regulations Concerning Procedures for Anti-Money Laundering, in particular Circular No. 24/2000 and its amendments by Notices No. 1045/2004 and 2922/2008
- Any United Nations sanctions that are applicable through ratification by the UAE (singularly and collectively, Regulation and Regulations).

Pursuant to the Regulations, it is mandated for financial institutions in the United Arab Emirates (UAE) to adopt a risk-based approach in order to fulfill their legal obligations. This requirement applies to various activities such as customer onboarding and conducting periodic anti-money laundering (AML) assessments throughout the course of business operations. Capital Chain is fully committed to implementing a robust and meticulous risk-based compliance program, in strict accordance with both legal mandates and industry-leading best practices.

#### **Investigatory Powers and Criminal Enforcement:**

The oversight of reporting and probing suspected illicit financial conduct in the United Arab Emirates (UAE) falls within the purview of the Financial Intelligence Unit (FIU) operating under the UAE Central Bank. The Public Prosecution retains the authority to initiate legal proceedings pertaining to these offenses, which are adjudicated within the criminal courts system.

#### **Defenses :**

The Regulations do not provide any legally established defenses specific to charges of money laundering. The defenses applicable under United Arab Emirates (UAE) law for money laundering charges are not distinct from those available for any other criminal offense.

It is important to note that criminal proceedings related to money laundering cannot be resolved through settlement or plea agreements. Once the Public Prosecutor determines that actions amount to a money laundering offense, prosecutorial discretion is not allowed, and the Public Prosecutor is obligated to refer the case to the criminal courts.

### **Detection of Unusual/Suspicious Transactions :**

Capital Chain's transactions predominantly involve individual transactions ranging from \$9 to \$999. In adherence to the legal obligations, meticulous manual approval process is diligently undertaken for each transaction, employing the principles of due diligence. This rigorous approach serves the purpose of effectively detecting any transaction that may exhibit characteristics of being abnormal, irregular, or indicative of potential suspicious activity. By diligently scrutinizing and individually approving every transaction, Capital Chain aims to safeguard business operations and maintain compliance with relevant regulations and standards governing the prevention of money laundering, terrorist financing, and other illicit activities.

### **Risk Rating :**

Within Capital Chain, a distinct and dedicated risk management unit exists, tasked with the meticulous manual examination of individual client profiles. With an emphasis on comprehensive risk assessment, due diligence is conducted thoroughly on the customers subsequent to evaluating their risk rating. This process allows to effectively assess and mitigate potential risks associated with the clientele in compliance with applicable legal and regulatory frameworks.

### **Resolutions and Sanctions :**

In situations where there is non-compliance with the established standards, the Regulations offer administrative sanctions to ensure the appropriate implementation of the regulatory framework. These sanctions may include various measures such as warnings, monetary fines, limitations or suspension of business activities, apprehension of board members and senior management who are held accountable for violating the regulations, as well as curtailment of the authority of the board and senior management through the appointment of a temporary observer.

In the event of a conviction for a money laundering offense, the Anti-Money Laundering (AML) Law prescribes punitive measures which encompass financial penalties ranging from AED 100,000 to AED 10 million, along with the possibility of imprisonment for a period of up to 10 years.

**Capital Chain's Obligations :**

- Identify potential risks associated with criminal activities within its operations.
- Conduct ongoing assessments of these identified risks.
- Establish internal controls and policies to effectively manage the identified risks.
- Implement appropriate due diligence procedures, as further elaborated below.
- Adhere to and implement any United Nations (UN) directives pertaining to the prevention of financing terrorism and the proliferation of weapons of mass destruction

**Designated Compliance Team :**

The Risk Management team should regularly perform compliance testing to ensure adherence to legal requirements. A Designated Compliance Officer should hold responsibility for the comprehensive Anti-Money Laundering/Combating the Financing of Terrorism (AML/CFT) program, including the coordination and oversight of its day-to-day operations.

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## 2. Know Your Customer (KYC) Policy

### **Customer and Business Partner Due Diligence :**

Dealers in real estate and non-resident customers (especially those from high-risk countries), foreign and local politically exposed persons (PEP), complex legal entities and third-party buyers are examples of high-risk counterparties, which therefore require enhanced due diligence procedures.

### **Know Your Customer (KYC) :**

The purpose of the KYC procedures is to provide a mechanism through which potential counterparties can be identified and resolved in a simple, streamlined fashion, but at the same time provide a mechanism which ensures that all interested parties have been consulted.

It is important for Capital Chain to obtain such information because this process effectively mitigates the risk of being exploited for the purpose of money laundering and terrorism financing, which can be reduced to a minimum. The process would also enable suspicious transactions to be detected because they are incompatible with the information received.

Capital Chain is required to undertake KYC measures for all proposed transactions and business relationships. Under general KYC measures, Capital Chain should:

- A. Verify the identity of the counterparty on the basis of original or properly certified documents, data or information issued by or obtained from a reliable and independent source;
- B. Identifying the ultimate beneficial owner, and taking reasonable measures to verify the identity of the ultimate beneficial owner such that Capital Chain is satisfied that it knows who the ultimate beneficial owner is. For legal persons and arrangements , this should include Capital Chain taking reasonable measures to understand the ownership and control structure of the counterparty. In the event of a counterparty claiming to be acting on behalf of another, it must be verified that this person has the proper legal authority to do so;
- C. Obtaining information on the purpose and intended nature of the business relationship to develop the counterparty risk profile;
- D. Seek to understand source of wealth and source of funds; and
- E. Undertake ongoing due diligence of the business relationship with the counterparty and scrutiny of transactions undertaken throughout the course of that relationship to ensure that the transactions being conducted are consistent with Capital Chain's knowledge of the counterparty, their business and risk profile.

Capital Chain should apply each of the KYC measures under Items (a) to (e) above, but may determine the extent of such measures on a risk sensitive basis depending on the type of counterparty, business relationship or transaction. It is recommended that measures taken should be consistent with any guidelines issued by competent authorities. For higher risk

categories, Capital Chain should perform enhanced due diligence. Records should be kept for a minimum of five years.

Where Capital Chain is unable to comply with Items (a) to (c) above, it must not commence business relations or perform the transaction; and it must terminate the business relationship; and must make a suspicious transactions report in relation to the counterparty.

These requirements should apply to all new counterparties and Capital Chain must also apply these requirements retrospectively to existing counterparties on the basis of materiality and risk, and should conduct due diligence on such existing relationships at least annually.

### **Identity :**

Capital Chain will establish and verify the identity of any counterparty with or for whom it acts or proposes to act. Initially Capital Chain will adopt the following approach in establishing and verifying a counterparty's true identity. Capital Chain may update as appropriate any counterparty identification policies, procedures, systems and controls having considered its risk assessment in respect of the counterparty. The following list should be considered as guidance regarding the type of information and evidence which must be obtained by Capital Chain to establish and verify the identity of a counterparty before conducting any transactions or entering any business relationships:

#### **Natural Persons :**

- A. Full name
- B. Date of birth
- C. Nationality
- D. Legal domicile
- E. Current residential address (not a PO box)
- F. Name and address of employer
- G. Approval of higher management if the customer or beneficial owner is a PEP

Items (a) to (g) at minimum must be obtained from the "would-be" beneficial owner of the property. A beneficial owner is one who owns or exercises effective ultimate control, whether directly or indirectly, over a customer.

Items (a) to (c) above should be obtained from a current valid passport or, under exceptional circumstances where a counterparty does not possess a passport, an official identification document which includes a photograph.

Documentary evidence of address (any of the following):

- (a) Tenancy agreement
- (b) Utility bill
- (c) Letter from employer or sponsor (as the case may be) confirming residential address

### **Legal Persons and Arrangements**

- (a) Full business name and any trading name
- (b) Registered or business address
- (c) Name and address of legal representative in the UAE, if person is located outside of the UAE
- (d) Date of incorporation or registration
- (e) Place of incorporation or registration
- (f) A copy of the certificate of incorporation or registration
- (g) A copy of the articles of association or any similar documents
- (h) A valid commercial or professional license
- (i) The identity of the directors, partners, trustees or equivalent persons with executive authority of the legal person
- (j) For a trust, a certified copy of the trust deed to ascertain the nature and purpose of the trust and documentary evidence to the appointment of the current trustees

### **Legal Representatives**

- (a) Legalised power of attorney
- (b) Legalised memorandum of association or articles of association
- (c) If (a) or (b) do not provide for the authority of the legal representative, a legalised board resolution and power of attorney
- (d) Items (a) to (e) listed above under Natural Persons

Where identification documents cannot be obtained in original form, for example, because Capital Chain has no physical contact with the counterparty, the counterparty should be considered high-risk, and Capital Chain should always obtain a copy certified as a true copy by a person of good standing such as a registered lawyer or Notary Public, a chartered accountant, a bank manager, a police officer, an employee of the person's embassy or consulate, or other similar person.

Downloading publicly available information from an official source (such as a regulator's or other official government website) is sufficient to satisfy the requirements of counterparty verification. KYC information and research obtained from a reputable company or information-reporting agency may also be acceptable as a reliable and independent source as would banking references and, on a risksensitive basis, information obtained from researching reliable and independent public information found on the internet or on commercial databases.

### **Source of Wealth / Source of Funds**

As a general rule, but particularly in the case of high-risk counterparties, Capital Chain should obtain:

- (a) Information regarding the origin of the funds
- (b) Information regarding the structure of the funds, if loans or credit finance
- (c) Information regarding the source of wealth and income

Where Capital Chain is unable to obtain satisfactory evidence of Items (a) - (c) above, it must not commence business relations or perform the transaction, or it must terminate the business



relationship; and should consider making a suspicious transactions report in relation to the counterparty.

Capital Chain should only accept payment from authorised and recognised banks.

### **Indicators of Suspicious Activity**

- Non-transparent or unusually complex ownership structure
- Counterparty and/or its funds originate from high-risk countries
- Payment in cash • Counterparty has an unusual income (eg. the counterparty has no income or there is an inconsistency in the counterparty's income and standard of living)
- Unusual rise in counterparty's financial means
- Transactions are anonymous
- Use of front companies, shell companies, trusts and other corporate structures to purchase property
- Use of complex loans, credit finance, or mortgage schemes to purchase property
- Reliance on third parties to conduct a sale or purchase of a property on a counterparty's behalf
- Manipulation of the property's valuation (eg. successive sales on the same property at higher prices)

Once the identity of a counterparty has been determined, Capital Chain must ensure sanctions compliance by screening the counterparty on all applicable sanctions lists. This should be a mandatory process which must be followed by Capital Chain in respect of each counterparty prior to the establishment of a business relationship.

Where Capital Chain discovers the counterparty appears on any applicable sanctions list, it must not commence business relations or perform the transaction; it must terminate the business relationship; and must make a suspicious transactions report in relation to the counterparty.

High-level overview of the obligations for DNFBP's in the UAE in relation to sanctions as provided by the UAE Central Bank:

- (a) Maintain a continuously up-to-date awareness of the persons and organisation listed in the relevant UN Security Council Sanctions Committee's lists and comparing these on an ongoing basis with its counterparty databases;
- (b) Ensuring, prior to entering into business relationships or conducting any transactions with natural persons or organisations, that such persons or organisations are not included in the relevant sanctions list<sup>12</sup> as per the UAE's obligations as a member of the UN;
- (c) Freezing (or unfreezing when so instructed by the competent authorities) the funds of listed persons or organisations, which the supervised institutions hold, have access to, or otherwise control; and

(d) Immediately reporting to the supervisory authorities (federal or local regulator) when listed persons or organisations are identified and/or when the funds of such persons or organisations are frozen.

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### **3. Privacy Policy**

When you use our services, we collect and store personal data about you. This Privacy Statement (the 'Policy') informs you of the methods used to handle your personal data.

**Information about the following is included in this Privacy Policy:**

- How do you get in touch with the person in charge of your personal data?
- In what ways do we obtain and what information do we gather about you?
- How do we make use of the information you provide about yourself?
- How do we keep our customers' personal information safe and secure?
- We share your personal information with whom?
- What about international organizations and third countries?
- When it comes to enforcing your rights, how do you go about it?

**WHO IS THE CONTROLLER OF YOUR PERSONAL DATA AND WHOM TO CONTACT?**

The controller of personal data is Capital Chain with its registered office at 01, Ground Floor, Rodney Court Building, Rodney Bay, Gros-Islet, St Lucia, you can contact Capital Chain at [info@capitalchain.co](mailto:info@capitalchain.co) regarding any questions and the exercise of rights relating to the processing of your personal data.

**WHAT AND HOW DO WE COLLECT PERSONAL INFORMATION ABOUT YOU?**

The information in this part is meant to give you a broad overview of how and what types of personal data we acquire from you. Personal data includes any information that can be used to identify or connect you to a specific individual.

When you use our services, you provide us with much of the information we need to know about you. In particular, this includes:

Specifically, whether you sign up for an account, provide personal information, place an order, participate in an event or project, or connect with us via customer service or social media.

Identification and contact data include your name; surname; phone number; e-mail;

postal address; date of birth; username and password; and any warranty claims you may have made. Payment data include your bank account information; and other data, such as records of communication between you and our company or information about any warranty claims.

Your personal information that we automatically gather when you utilise our products or services. Among these are information about your device (such as your IP address), information about how you use a website (such as the time and date of your visit and the country from which you accessed the website), and information about how you use a service (such as the login and logout information, your account settings, the value of your fictitious capital, your account currency, business strategy)

If you choose to link your social networking accounts to your account on the website, third parties may give us information about you. Examples of these third parties include the providers of trading platforms on which you choose to trade using our services. Financial data (such as kind of instrument, time of starting and closing a trade), as well as data from social networks (such as profit or loss), are included (user name, profile picture, e-mail address associated with the account on the social network). For details on how trading platform providers and social network operators use your personal information for their own purposes, please refer to their privacy policies.

Additionally, when you provide your phone number during account creation, events, partnership, or any other form of communication with us, we may store and use this number for service-related and promotional communication purposes, including marketing outreach via manual or automated (AI-based) phone calls or SMS.

Do you know what we do with the information you provide us?  
This is how we make use of personally identifiable information:

Creating a user account and signing up

In order to utilise the services, you must register on the website and create an account, and we use your personal data for this purpose

Personal information:

Your name, email address, and phone number are required to identify you and get in touch with you.

The legal justification for the processing of personal data:

You must provide your personal data to us in order for us to register your user account, as we cannot do so without it.

Providing services, exercising contractual rights and responsibilities, and so on:

We need to process your personal data in order to offer you our services, i.e. to give you appropriate access, tools, and assistance, and to conduct transactions. As a rule of thumb, the following should be followed:

Personal data includes name, address, phone number, email address, payment information, information about how the service is used, information about simulated transactions, and information from social media profiles that you choose to link to your account on the website.

Legitimate interest or fulfillment of a contract under which we provide our services are both sufficient legal grounds for processing. We retain your personal information for a short amount of time after we no longer provide you with services. The processing is necessary to preserve and defend our rights, which are based on our legitimate interests.

Promotion of our products and services or participation in events:

The marketing messages we send to our existing and former customers will be based on our products and services. Commercial communications may also be sent to you, to the extent to which you have given us your permission. To make it easy for you to discontinue receiving business communications, each email received will be clearly labelled as business communication and include a link that allows you to do so. As a rule of thumb, the following should be followed:

Personal information:

Contact information and identification.

The legal justification for the processing of personal data:

If you have used our services, we may occasionally contact you with marketing materials because we have a genuine interest in staying in touch with those who have used our services.

If you agree to allow us to use your personal data for marketing reasons, we will do so.

Personal information:

If you contact us via social media, we collect your name, email address, phone number, and other personal information.

The legal justification for the processing of personal data:

Our legitimate interest in processing data is to keep our customers happy and to make our services more useful to them. Your personal data may be processed in order for us to create, test, improve, and secure some of our services if you utilise them. As a rule of thumb, the following should be followed:

Personal information:

Personal information, such as your name, address, phone number, and email address, as well as information about your device, the website, and your use of the services.

The legal justification for the processing of personal data:

Our legitimate interest in processing data is to make our services better.

#### Phone-Based Marketing Communication (Including AI-Based Outreach):

We may use the phone number you provide us during registration, events, partnership, or any other form of communication with us to contact you with marketing communications. These communications may include promotional messages, service updates, or product information, delivered via manual or automated (AI-based) phone calls or SMS.

- Personal data involved: Your phone number, and, where applicable, other identification and contact data.
- Legal justification for the processing of personal data: We process this data based on your consent or our legitimate interest in promoting and improving our services. You may withdraw your consent or opt out of such communication at any time.

#### Analytics

We employ consumer behaviour analysis to learn more about how our website and services are being used. As a rule of thumb, the following should be followed:

#### Personal information:

Personal information, such as your name, address, phone number, and email address, as well as information about your device, your use of the website, and the results of your simulated trades.

#### The legal justification for the processing of personal data:

Our legitimate interest in processing data is to learn more about our customers' buying habits and preferences.

#### How do we keep our personal information safe?

Personal data is stored on computers and other devices in an encrypted database.

Organizational and technical safeguards have been put in place to protect the data that we collect and handle from unauthorized access, modification, disclosure, or destruction.

#### How long does it take us to process your information?

As stated above, personal data are only processed as necessary to accomplish the stated goals and for as long as is required by law. It is then destroyed or anonymized after that. For the following periods of time, we collect and use personal information:

The processing of personal data is limited to the duration necessary to carry out the agreement and to execute the parties' rights and obligations under it, such as handling complaints, resolving damage claims, or engaging in legal action.

if you don't give us permission to send you business communications, we keep your personal data for a maximum of 5 years from the end of your last contract with us or until you object or unsubscribe from the business communications; if we need to fulfill our legal obligations, we keep your personal data for the period set out by the relevant law;

#### THIRD PARTIES USE OF YOUR INFORMATION:

In order to deliver our services, we make your data available or transmit it to the following people:

Simulated trades are made possible by your trading platform provider Website and service providers (such as other companies in the group, cloud service providers, payment system operators, financial institutions, service and support providers, IT companies, marketing and communication agencies, consultants, and postal service providers), as well as other third parties

In addition, we may send your personal information to parties for whom you have given your permission, as well as in circumstances where we are legally required to do so. The recipients of your personal data are contractually required to protect your information in accordance with applicable laws and to use it only in line with our instructions in accordance with the terms of their contract with us.

As data controllers, third parties gather personal information for their own ends. Personal data will be processed in accordance with their own guidelines in this situation.

## YOUR RIGHTS

Send a request to [info@capitalchain.co](mailto:info@capitalchain.co) to exercise all of your rights, including the right to withdraw your permission. As a user, you have the following rights when it comes to personal data:

### The right to access personal information

Whenever you want to know if your personal information is being used, you can ask us to give you a confirmation letter. If we do anything with your data, we'll let you know about it. The personal data we collect and use will be made available to you if you request it. The first copy is free, however, subsequent copies can be purchased for a nominal cost.

Individuals have the right to have their personal information corrected. Please contact us if your personal data is incorrectly processed and we will correct it as soon as possible. If you sign up for an account on the Website, you will be able to edit and correct your personal information.

### The 'right to be forgotten' (right to deletion of personal data)

In the following circumstances, you have the right to have your personal data deleted from our systems immediately: As soon as the data gathered or otherwise processed is no longer required for the stated purposes, Your consent to their processing will be revoked if you do so and there is no other legal basis for their processing (this only applies in circumstances where we treat personal data on your consent). Processing for direct marketing reasons, if you object to the processing and there are no overriding legal grounds;



Please contact us if your personal data is incorrectly processed and we will correct it as soon as possible. If you sign up for an account on the Website, you will be able to edit and correct your personal information.

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If you believe that your personal data has been improperly processed, please contact us.

When a request is made for personal data to be erased, we will not be able to do so if their processing is necessary for exercising the right to freedom of expression and information; compliance with any of our legal obligations; performance of a task carried out in the public interest; establishment, exercise or defense of our legal claims; or other reasons permitted by law.

The right to limit the use of data

Article 18 of the GDPR gives you the right to request a temporary halt to the processing of your personal data. Possession and use of information in a machine-readable format, as well as the right to access to such data When we process your personal information through automatic means, you have the right to receive the data in a structured, commonly used, and machine-readable format and to have it transferred to another personal data controller.

The right to express one's views

You have the right to object to the processing of your personal data if we do so because it is in our legitimate interests to do so. Our ability to process your personal data is restricted if you raise an objection, and we must show that the processing is necessary to establish, exercise, or defend our legal claims and we have a compelling legitimate interest in doing so.

If you object to our use of your personal data for marketing purposes, we shall immediately stop doing so. Our ability to send you offers for our products and services will be terminated if you do this.

#### The ability to revoke consent

You have the right to revoke your consent at any time if the processing is based on that consent. The lawfulness of processing based on prior consent is unaffected by the withdrawal of consent.

The right not to be subjected to automated decision-making processes.  
You have the right not to be the subject of any decision based purely on automated processing, including profiling, that generates legal effects concerning you or otherwise affects you to a significant extent, unless this is permitted by relevant legislation or based on your express consent.

The right to file a complaint with the governmental agency responsible for investigating complaints.

You can file a complaint with the relevant supervisory authority if you believe that we are misusing your personal information. Our headquarters are located at this location.

#### REQUIREMENTS TO BE MET

We reserve the right to amend this policy at any time, but we will notify you of any such change. A copy of this policy can be found in your Client Section. Use of your own affiliate link shall not count as affiliate commission.

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## 4. Responsible Trading / Complaints Procedure

When it comes to trading on Capital Chain or using its social trading features, we encourage responsible behaviour among all our users. Our “responsible trading policy” calls on traders to protect themselves from emotional decision making that can result in unnecessary losses. Novice traders, in particular, tend to rely more on “gut feelings,” because they don't necessarily have a lot of experience in financial trading to make rational and informed choices. To help traders avoid making rash online trading decisions, Capital Chain, in accordance with local financial regulators, recommends the following:

Maximum leverage according to the following list:

30:1 for major currency pairs

20:1 for non-major currency pairs, gold and major indices

10:1 for commodities other than gold and non-major equity indices

5:1 for individual equities and other reference values

2:1 for cryptocurrencies

Place no more than 20% of your equity on one trade

The key factors of smart investing are low leverage and portfolio diversity, a fact attested to by the portfolios of Capital Chain's top traders.

### **Here are some tips for becoming a more responsible trader:**

**Only invest in what you know:** Don't follow random tips or gut feelings. If you want to invest in a certain asset, familiarise yourself with its history and tendencies.

**Look at your Risk Score:** Your unique Risk Score is a great way to see if you are a responsible trader. Keeping a Risk Score of 3 or lower on Capital Chain is recommended.

**Adjust your portfolio:** Diversify your portfolio with assets across many classes. If you don't want to monitor your portfolio frequently, opt for lower-involvement instruments, such as CopyPortfolios™ or our CopyTrader™ system.

**Copy other responsible traders:** When you copy another trader, look at their Risk Score, history, and portfolio diversity.

## 5. Complaint Process

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### 1. Purpose

Complaints and Reports of Illegal Activity Procedure. At Capital Chain, we are committed to maintaining the highest standards of ethical conduct and compliance with legal and regulatory requirements. We understand the importance of a robust process for addressing any reports of illegal activity. This page outlines our comprehensive complaint procedure, ensuring transparency, accountability, and prompt action.

How to Report : If you wish to report an incident or concern, please send a detailed email to [support@capitalchain.co](mailto:support@capitalchain.co). We encourage you to include as much information as possible to facilitate a thorough investigation or Contact via Live Chat

### 2. Scope

This procedure applies to all complaints received from clients, partners, or other stakeholders relating to:

- The products or services provided by Capital Chain
- Conduct of Capital Chain employees or representatives
- Any other aspect of the company's operations that may impact client satisfaction or trust

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### 3. Definition of a Complaint

A complaint is defined as:

“An expression of dissatisfaction, whether oral or written, about the provision of (or failure to provide) a financial or trading service by Capital Chain, which requires a response or resolution.”

### 4. Procedure

The Company ensures that its current complaints process is applicable for all categories of clients. Resolution of client complaints is achieved without undue delay, taking into consideration the seriousness of the complaint as well as the financial implications this may have to both the client as well as the Company. This Complaints Policy and the Complaints Handling Policy gathers all necessary information and uses the measures taken by the Company to solve potential inconveniences, complaints and/or grievances that might occur among the business relationship between the client and the Company.

A complaint must be written in English and include the following information:

- The client's full name
- The client's trading account number
- The Client's address and email address
- The affected transaction(s) number (if applicable)
- Date and time that the issue causing the complaint arose.
- A full and clear description of the issue causing the complaint/content of the complaint.
- Reference to any correspondence exchanged between the Company and the client (such correspondence should be attached).
- The Company may, at its discretion, refuse to handle a complaint if any of the requirements contained in the above subparagraph is not fulfilled.
- Clients or potential clients can submit complaints to the Company free of charge. When handling a complaint, communication with clients or potential clients shall be clear, in plain language that is easy to understand.
- All complaints will be treated with strict confidentiality.


### **Our Support Hours:**

Our support team is available Monday to Friday, from 9:30 AM to 6:00 PM (UAE Time).

On Saturdays, live chat operates from 10:00 AM to 3:00 PM (UAE Time).

Please note that our office is closed on Sundays.

If you need assistance outside these hours, feel free to email us at [support@capitalchain.com](mailto:support@capitalchain.com), and we'll get back to you as soon as possible.

 **Tip:** When contacting support, provide your account ID, platform, and a clear description of the issue to speed up the resolution process.