

# Blackstone Capital Inc.

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## ANTI-MONEY LAUNDERING (AML) POLICY

### 1. GENERAL PRINCIPLES

1.1. Blackstone Capital Inc. (hereinafter - the "Company") is committed to high standards of compliance with anti-money laundering (AML) and counter-terrorist financing requirements.

1.2. The Company applies a "Know Your Customer" (KYC) policy to all clients without exception.

1.3. This policy is developed in accordance with international FATF standards and industry best practices.

### 2. CLIENT IDENTIFICATION PROCEDURES

#### 2.1. Basic Identification:

- Identity document verification (passport)
- Contact information confirmation
- Client questionnaire completion

#### 2.2. Enhanced Due Diligence (for amounts over 250,000 USD):

- Additional verification of sources of income
- International sanctions list checks
- Business relationship analysis

### 3. TRANSACTION MONITORING

3.1. The Company conducts ongoing monitoring of all client operations to identify suspicious transactions.

3.2. Criteria for suspicious operations:

- Operations inconsistent with client profile

- Frequent cash operations
- Operations with high-risk jurisdictions
- Unusual funds movement patterns

#### **4. REPORTING**

4.1. Upon detection of suspicious operations, the Company sends appropriate notifications to competent authorities.

4.2. The Company maintains records of all transactions and client documents for a minimum of 5 years.

#### **5. STAFF TRAINING**

5.1. All Company employees undergo mandatory training on AML/KYC issues.

5.2. Regular training sessions are conducted to update knowledge in the field of anti-money laundering.