



EDX Markets Compliance Due Diligence Overview

EDX Markets LLC (“**EDX Markets**”) has robust Compliance Program standards that reflect industry best practices to prevent the use of the Exchange to commit financial crimes. Below are the due diligence standards we adhere to in order to fulfill our AML/KYC regulatory requirements and keep our members safe from exposure to illicit funds.

Required Questions	Yes	No	If yes, please explain
1. Has the company been subject to any regulatory or enforcement action in the past 5 years?			Provide copies of remediation action plans.
2. Has the company been subject to any fines by a regulatory agency in the past 5 years?			
3. Is the company currently engaged with any regulatory or enforcement agency for any AML / Sanctions deficiencies?			Please clarify deficiency identified, regulatory body involved, and remediation action plan.
4. Please explain any other significant AML / Sanctions Compliance Program regulatory agency inquiries that Paxos should be aware of.			

Required Documentation Checklist

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<input type="checkbox"/> EDXM Membership Application
<input type="checkbox"/> EDXM Due Diligence Questionnaire
<input type="checkbox"/> Exchange User Agreement
<input type="checkbox"/> EDXM Retail Member Organization Form (if applicable)
<input type="checkbox"/> Organizational Documents: Organizational chart which details the ultimate beneficial owner; Articles of Incorporation and Bylaws (for corporations); Partnership Agreement (for partnerships); Certificate of Formation and Limited Liability Company Agreement or Operating Agreement (for limited liability companies); Documentation of Legal Entity Structure; Certificate of Good Standing/Registry Extract.
<input type="checkbox"/> Proof of Tax Identification Number - IRS Form W-9 or W-8 , or foreign equivalent
<input type="checkbox"/> Corporate Bank Statement
<input type="checkbox"/> AML/KYC Sanctions Policies and Procedures (KYC / Information Collection and Verification Controls and Process Sanctions / Screening Controls and Process; IP /Geo Blocking Controls and Process; Monitoring and Regulatory Reporting; Independent Audit Proof of licenses

EDXM Ongoing Due Diligence

EDXM will undertake an annual due diligence review of the member’s AML and Sanctions Compliance Program. EDXM may also undertake ad hoc due diligence depending on the business profile, identified risks or other priorities.

If you have any questions, please reach out to membership@edxmarkets.com