

Compliance & Regulatory Statement

B.B. Bluebridge Trading Co. Ltd

1. Introduction

B.B. Bluebridge Trading Co. Ltd (“Bluebridge”, “the Company”) is committed to conducting its business in accordance with the highest standards of legal, regulatory, and ethical compliance. As a professional B2B trader of high-end luxury watches, the Company maintains robust internal controls designed to ensure transparency, integrity, and compliance with applicable laws and regulations.

This Compliance Statement outlines the principles, policies, and controls applied by Bluebridge to manage regulatory obligations, financial crime risks, and operational integrity.

2. Corporate Information

Legal Name: B.B. Bluebridge Trading Co. Ltd

Company Number: HE 480375

Registered Address:

Dikomou, 12

AGORA COURT 2, Flat/Office 104

Kiti, 7550, Larnaca

Cyprus

Business Activity: Business-to-Business (B2B) trading of luxury wristwatches

Legal Form: Private Limited Company

3. Business Scope and Operating Model

Bluebridge operates exclusively as a **B2B trading company**. The Company does **not** offer retail services and does **not** transact with private individuals.

All transactions are:

- Conducted with **EU-based legal entities**
- Executed on an **order-driven basis**

- Supported by formal contractual and commercial documentation

The Company does not maintain speculative inventory. Watches are sourced solely to fulfill confirmed customer orders, ensuring full traceability and reducing operational and financial risk.

4. Regulatory and Legal Compliance

Bluebridge operates in compliance with all applicable laws and regulations, including but not limited to:

- Cyprus corporate and commercial law
- EU trade and customs regulations
- Anti-Money Laundering (AML) and Counter-Terrorist Financing (CTF) requirements
- Sanctions and restricted jurisdiction regulations
- Financial crime prevention standards applicable to high-value goods trading

The Company does not represent itself as a regulated financial institution and does not provide financial or investment services.

5. Anti-Money Laundering (AML) & Counter-Terrorist Financing (CTF)

B.B. Bluebridge Trading Co. Ltd applies a comprehensive and risk-based Anti-Money Laundering (AML) and Counter-Terrorist Financing (CTF) framework that is proportionate to the nature, scale, and complexity of its business activities.

Given the high value and portability of luxury watches, the Company recognizes that its sector may be exposed to elevated financial crime risks. Accordingly, Bluebridge has implemented enhanced controls designed to prevent money laundering, terrorist financing, fraud, and other forms of financial crime.

5.1 Risk-Based Approach

Bluebridge applies a **risk-based approach** to AML and CTF, meaning that the level of scrutiny and controls applied to a transaction or business relationship is commensurate with the assessed level of risk.

Risk factors considered include, but are not limited to:

- Customer type and legal structure
- Country of incorporation and operation
- Transaction size, frequency, and complexity
- Source of funds and economic rationale
- Industry reputation and historical behavior

Higher-risk indicators trigger enhanced scrutiny or refusal of the transaction.

5.2 Transaction-Level Controls

All transactions conducted by Bluebridge must meet the following criteria:

- Clear commercial purpose linked to the customer's stated business activity
- Documented purchase order and commercial invoice
- Identifiable source and destination of funds
- Transparent pricing consistent with market conditions

Transactions that lack a clear economic or commercial rationale, appear unusually structured, or deviate from expected customer behavior are escalated for review or declined.

5.3 Prohibited Activities

Bluebridge strictly prohibits involvement in:

- Cash-based transactions
- Third-party payments not directly linked to the contracting entity
- Circular or pass-through payment structures
- Transactions intended to disguise ownership, source of funds, or destination of goods

Any transaction suspected of being linked to illicit activity is immediately halted and assessed internally.

5.4 Sanctions & Restricted Jurisdictions

The Company does not conduct business with:

- Sanctioned individuals or entities
- Countries subject to EU, UN, or international sanctions
- High-risk or non-cooperative jurisdictions identified by competent authorities

Sanctions screening is applied during customer onboarding and reviewed on an ongoing basis.

5.5 Record Keeping & Audit Trail

Bluebridge maintains comprehensive records to ensure a full audit trail, including:

- Customer identification and verification documentation
- Contracts, invoices, and payment confirmations
- Shipping and logistics documentation
- Internal compliance assessments

Records are retained in accordance with applicable legal and regulatory requirements.

6. Customer Due Diligence (CDD) & Enhanced Due Diligence (EDD)

Bluebridge applies strict Customer Due Diligence (CDD) procedures prior to entering into any business relationship. The Company conducts business **exclusively with professional, legally established entities** and does not onboard private individuals.

CDD measures are designed to verify the identity, legitimacy, and integrity of customers and to assess the risk profile of each business relationship.

6.1 Customer Onboarding Requirements

Before accepting a customer, Bluebridge requires and reviews, where applicable:

- Certificate of incorporation or equivalent registration document
- Company registration number and registered address

- Description of business activity and operational profile
- Confirmation that the customer operates as a professional trader or business buyer
- Identification of directors and authorized signatories

Customers must demonstrate a legitimate business purpose aligned with luxury watch trading or related professional activity.

6.2 Beneficial Ownership & Control

Bluebridge seeks to understand the ownership and control structure of its customers. Where applicable, this includes:

- Identification of ultimate beneficial owners (UBOs)
- Review of ownership percentages and control rights
- Assessment of whether ownership structures are transparent and commercially reasonable

Complex, opaque, or nominee-based ownership structures may result in enhanced scrutiny or refusal to onboard.

6.3 Source of Funds & Payment Verification

To ensure financial transparency:

- Payments must originate from a bank account held in the name of the customer
- Payment activity must align with the customer's known business operations
- The source of funds must be consistent with the customer's economic profile

Bluebridge does not accept payments from unrelated third parties or personal accounts.

6.4 Enhanced Due Diligence (EDD)

Enhanced Due Diligence is applied when higher risk indicators are identified, including but not limited to:

- Elevated transaction values

- New customers with limited operating history
- Cross-border transactions involving higher-risk jurisdictions
- Unusual transaction patterns

EDD measures may include additional documentation requests, deeper background checks, or management-level approval.

6.5 Ongoing Monitoring

Customer relationships are subject to ongoing monitoring to ensure consistency with the Company's understanding of the customer and their business.

This includes:

- Review of transaction behavior over time
- Assessment of deviations from expected activity
- Periodic reassessment of customer risk profiles

Bluebridge reserves the right to suspend or terminate relationships if compliance concerns arise at any stage.

6.6 Refusal and Termination Rights

The Company reserves the absolute right to:

- Decline onboarding of any customer
- Refuse specific transactions
- Terminate existing business relationships

Where compliance, reputational, or financial crime risks cannot be adequately mitigated.

7. Payments and Financial Controls

To ensure transparency and financial integrity:

- Payments are accepted **exclusively via bank transfer**
- No cash payments are accepted

- No cryptocurrency transactions are permitted
- No third-party or intermediary payments are accepted

All payments must originate from accounts held in the name of the contracting business customer. Funds are used solely for legitimate business purposes, including supplier payments related to confirmed orders.

8. Supplier Due Diligence and Source of Goods

Bluebridge sources luxury watches only from professional, reputable suppliers. All purchases are supported by:

- Commercial invoices
- Shipping documentation
- Clear product identification and valuation

Goods are shipped directly from the supplier to the customer, ensuring efficiency, traceability, and reduced handling risk.

9. Sanctions, High-Risk Jurisdictions & Ethical Standards

The Company does not conduct business with:

- Sanctioned countries, entities, or individuals
- High-risk or non-cooperative jurisdictions
- Parties involved in illegal, unethical, or non-transparent activities

Bluebridge is committed to ethical business conduct, fair dealing, and long-term professional relationships built on trust and compliance.

10. Ongoing Monitoring and Review

Compliance is treated as an ongoing responsibility. Bluebridge regularly reviews its internal procedures to ensure they remain appropriate, effective, and aligned with evolving regulatory expectations and industry best practices.

11. Commitment to Transparency

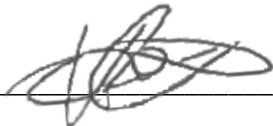
Bluebridge is committed to maintaining transparent and well-documented business operations. The Company cooperates fully with financial institutions, payment service providers, and competent authorities, as required by law.

12. Contact

For compliance-related inquiries, please contact:

Email: info@bluebridgetrading.net

Sign: _____

A handwritten signature in black ink, consisting of several loops and a long horizontal stroke, positioned over a horizontal line.