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PhoenixX Financial Integrity & Payment Compliance Policy

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Dispute Resolution: Zurich Arbitration (Swiss Rules)
Issued by: PhoenixX Compliance & Risk Management Division
Domain: phoenixx.one

1 | Purpose and Objective

This Policy establishes the principles, controls, and oversight mechanisms that safeguard PhoenixX's financial integrity and payment processes.
It ensures that all monetary flows associated with PhoenixX operations are lawful, transparent, auditable, and fully compliant with:

- Swiss and EU financial regulations,
- OECD Anti-Bribery Convention, and
- FATF Recommendations on anti-money-laundering and terrorist financing.

2 | Scope of Application

This Policy applies to:
• All PhoenixX entities and affiliates;
• All clients, suppliers, partners, and subcontractors receiving or making payments under PhoenixX agreements;
• All personnel with financial authority, including Finance, Compliance, and Operations teams.

3 | Regulatory and Policy Framework

Implemented in accordance with:
• Swiss Code of Obligations (OR) and FINMA guidelines;
• EU Directive 2015/849 (AMLD IV) and successors;
• U.S. OFAC and EU Sanctions Regulations;
• PhoenixX Compliance Set 2025, including:
– PHX-AFEC-1.0 (Anti-Fraud, Ethics & Compliance Policy)
– PHX-ABC-1.0 (Anti-Bribery & Corruption Policy)

– PHX-AML-1.0 (Anti-Money-Laundering & Sanctions Compliance Policy)
– PHX-MSA-1.1 (Master Services Agreement Policy)

4 | Financial Integrity Principles

PhoenixX adheres to the following principles:

1. **Transparency of Funds** – All income and expenditure must be recorded in the official accounting system and traceable to contractual obligations.
2. **Legitimacy of Source and Destination** – Only funds derived from lawful activities may be accepted or transmitted.
3. **Prohibition of Cash and Untraceable Payments** – PhoenixX does not accept or disburse cash, cryptocurrency, or anonymous e-money payments.
4. **Use of Designated Accounts** – All transactions must flow through approved PhoenixX bank accounts or regulated payment processors.
5. **No Third-Party Payments** – Payments may not be routed through unrelated entities or personal accounts.
6. **Invoice Verification** – Every invoice must reference a valid contract ID and pass compliance review before payment.
7. **Four-Eyes Principle** – All outgoing payments require dual authorization by Finance and Compliance.

5 | Tax and Withholding Compliance

PhoenixX and its counterparties must comply with all applicable tax laws.
Payments shall be made net of withholding taxes only where required by law.
Counterparties are obliged to provide proof of tax remittance and retain supporting records for a minimum of five (5) years in accordance with PHX-DREP-1.0.

6 | Anti-Kickback and Conflict-of-Interest Rules

PhoenixX prohibits all forms of kickbacks, hidden commissions, and preferential payments.
Personnel and partners must disclose any potential conflict of interest prior to engaging in financial transactions.
Violations are subject to disciplinary action and possible referral to law-enforcement authorities.

7 | Financial Controls and Oversight

1. **Segregation of Duties** – Initiation, approval, and execution of payments must be performed by different individuals.
2. **Periodic Reconciliation** – Monthly bank and ledger reconciliations are mandatory.
3. **Transaction Screening** – All payments are checked against sanctions and high-risk lists.

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4. **Internal Audit and External Review** – PhoenixX Finance and Compliance Departments conduct annual audits and external verification as required.

5. **Record Retention** – All financial records and approvals are kept for a minimum of five (5) years under PHX-DREP-1.0.

8 | Incident Reporting and Remediation

Any suspected financial irregularity must be reported immediately to the PhoenixX Compliance Office via secure channels as set out in PHX-IRP-1.0.
PhoenixX will investigate and may suspend payments pending clarification.
Confirmed violations may lead to contract termination under PHX-MSA-1.1 and notification of authorities.

9 | Enforcement and Sanctions

Non-compliance with this Policy may result in:
• suspension of services or payments;
• termination of contracts;
• civil or criminal referral; and
• listing on the PhoenixX Compliance Registry as "restricted."

10 | Review and Amendment

This Policy is reviewed annually by the PhoenixX Finance & Compliance Division to ensure alignment with current regulations and industry standards.
Amendments take effect upon publication on phoenixx.one.

11 | Contact

PhoenixX Finance & Compliance Office
PhoenixX LLC – Legal & Risk Division
finance-compliance@phoenixx.one
www.phoenixx.one

Governing Law: Swiss Substantive Law | Dispute Resolution: Zurich Arbitration (Swiss Rules)
This policy includes mandatory arbitration and contractual enforcement provisions.

Approval and Enforcement

This Financial Integrity & Payment Compliance Policy (PHX-FIN-1.0) is binding on all PhoenixX entities and counterparties. Compliance with this Policy is a prerequisite for all financial transactions with PhoenixX.

Approved by: PhoenixX Compliance & Risk Management
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