



Volity Trade Ltd.

**Company Number 2024-00059
Rodney Bay, Gros Islet, St. Lucia**

AML POLICY

AUGUST 2026

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Volity Trade Ltd

AML Policy

Volity Trade Ltd collects and verifies the personal identification information of all account holders, and then subsequently logs and tracks the transactions that are carried out by its clients. In order to open an account with The Company, a valid form of government-issued identification (Passport, State ID, or Driver's License), a proof of residence, and bank account information is required, along with a completed account application.

It should be noted that The Company tracks any suspicious transactions made by clients and any transactions executed under non-standard trading conditions.

Risk-Based Approach

The Company adopts a risk-based approach to AML/CFT compliance. A Business Risk Assessment shall be conducted at least annually to identify, assess and understand the money laundering and terrorist financing risks to which the Company is exposed. Customer risk shall be assessed based on factors including the customer's country of residence, nature of the business relationship, transaction patterns, products and services used, and delivery channels. Based on this assessment, customers shall be classified into Low, Medium, or High risk categories, with corresponding levels of due diligence applied.

Where a prospective client is a legal entity, the Company shall identify and verify the identity of the beneficial owner(s), defined as any natural person who ultimately owns or controls more than 25% of the shares or voting rights, or who otherwise exercises ultimate effective control over the legal entity. The Company shall obtain a certified copy of the certificate of incorporation, memorandum and articles of association, register of directors and shareholders, and a structure chart depicting the ownership chain up to the ultimate beneficial owner(s).

The Company's AML/CFT framework is established in accordance with the Money Laundering (Prevention) Act of St. Lucia (as amended), the Proceeds of Crime Act, the Counter-Terrorism Act, the Financial Intelligence Authority Act, and the regulations, guidelines and directives issued thereunder, as well as the recommendations of the Financial Action Task Force (FATF).

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- The Company carries out its activities in line with the anti-money laundering framework as laid out by the Financial Action Task Force.
- All The Company client funds are held in separate, segregated accounts that are designated solely for client deposits and withdrawals.
- The Company monitors funding from bank accounts held outside the account holder's home country.
- The Company does not accept deposits from third-parties nor cash deposits or disbursements under any circumstances.
- The Company matches each deposit to the account name held on file for that customer.
- The Company reserves the right to refuse to process a transaction where it believes the transaction to be connected in any way to money laundering or criminal activity. In accordance with international law, The Company is under no obligation to inform the client when suspicious activity is reported to any corresponding regulatory or legal bodies.

Account Opening Procedures - Know Your Customer Policy (KYC)

As part of the account opening procedure, prospective customers must provide proof of identity and address, source of funds and investment objectives to The Company.

The Financial Action Task Force (FATF) sets AML standards for countries to follow. The Company applies Enhanced Due Diligence to clients connected with jurisdictions identified by the FATF as high-risk or subject to increased monitoring. In addition, the Company does not accept clients who are residents or nationals of, or otherwise connected with, the following restricted jurisdictions: *the United States, North Korea, Iran, Myanmar, Cuba, Sudan and Syria*.

Customer Due Diligence

Customer Due Diligence incorporates "Know your Customer" or "KYC" procedures for the identification and verification of the identity of our customers, including, where applicable, their respective beneficial owners. The Company is committed to the prevention of money laundering activities through our services and as such comply with regulatory requirements such as:

- Identification and execution of enhanced due diligence measures for monitoring high-risk clients, including Politically Exposed Persons (PEPs), their relatives and close associates
- Senior management review and approval of high-risk customers, including Politically Exposed Persons

Photo ID - The following are acceptable forms of photo identification:

- A valid passport
- A valid National Identity Card
- A valid government ID, such as a Driver's Licence or State ID

(Please note that all photo IDs are verified through third-party compliance software.)

Proof of Residence - The following are acceptable forms of proof of residence:

- A utility or phone bill
- A bank statement

(Please note that proof of residence must be current i.e. not older than 90 days)

Bank Account Requirements

- The Company account holders must have a valid bank or credit card account in their name. The bank/credit card statement must show their name and the same registered address as that shown on their application.

Customers Screening

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The adoption of policies and procedures to ensure compliance with the applicable restrictive measures (i.e. EU/UN/OFAC sanctions) and that the Company does not engage in any activity for, on behalf of, for the benefit of, any individual, entity or organization subject to sanctions or maintain a relationship with a person against whom enforcement measures are effected. In this respect, ongoing customer screening is performed against a global collection of sanctions, Politically Exposed Persons, Adverse Media and Enforcement Data.

The Company shall screen all clients and beneficial owners at onboarding, and on an ongoing basis, against applicable sanctions lists including but not limited to: the United Nations Security Council Sanctions List, the OFAC Specially Designated Nationals (SDN) List, the European Union Consolidated Sanctions List, and any sanctions lists issued or adopted by St. Lucia. Screening shall also be conducted against adverse media databases and law enforcement lists.

Counter-Terrorist Financing (CFT) Measures

The Company maintains specific measures to detect and prevent the financing of terrorism, including screening all customers and beneficial owners against United Nations Security Council consolidated sanctions lists, OFAC SDN lists, and any sanctions lists adopted by St. Lucia. Any identified match or potential match shall be immediately escalated to the MLRO and, where required, reported to the Financial Intelligence Authority without delay. No transaction shall be processed pending the outcome of such screening where a potential match is identified.

Ongoing Monitoring of Customers and Reporting

The establishment of systems and processes to monitor account activity and customer transactions

Reporting

Creation, tracking and filing of Suspicious Activity Reports (SARs) and Suspicious Transaction Reports (STRs) to the appropriate regulatory authority where required

Red Flag Indicators

The Company has identified the following non-exhaustive list of red flag indicators that may warrant further investigation and/or the filing of a SAR: (a) transactions that have no apparent economic or lawful purpose; (b) unusually large or complex transactions, or unusual patterns of transactions; (c) deposits followed by immediate withdrawal requests without any trading activity; (d) reluctance to provide identification documents or provision of inconsistent information; (e) use of multiple funding sources or accounts without apparent business rationale; (f) transactions involving high-risk jurisdictions identified by the FATF; (g) structuring of deposits to avoid reporting thresholds.

Money Laundering Reporting Officer (MLRO)

The Company shall appoint a designated Money Laundering Reporting Officer ("MLRO") who shall be responsible for receiving internal suspicious activity reports, assessing them, and, where appropriate, filing Suspicious Activity Reports (SARs) with the Financial Intelligence Authority of St. Lucia or equivalent competent authority. The MLRO shall have direct access to senior management and the Board of Directors.

Independent Audit and Testing

The Company shall arrange for an independent audit of its AML/CFT controls at least annually. The audit may be conducted by internal audit (where such function is independent of the compliance function) or by a qualified external party. Audit findings shall be reported to the Board of

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Directors, and any identified deficiencies shall be addressed through a remediation plan with defined timelines.

Record Retention

The retention of customer and transaction records for a period of five (5) years after the termination of business relationship with customers, or transaction execution date

Training

The provision of adequate and frequent AML/CFT training for Company employees, relevant to the role they undertake, for the purpose of prevention of money laundering and terrorist financing

AML Compliance Vigilance

The Company is fully committed to remaining vigilant to prevent the use of its products and services by those who seek to abuse them. It continually seeks to combat money laundering and terrorist financing through the prevention, detection and reporting of unusual or suspicious behaviour.

In addition, the Company constantly assesses the effectiveness of its existing policies, procedures and technologies and updates them as needed to address the changing environment. The Company also established an employee training program to ensure that the staff is well-informed about the evolving techniques used by criminals to penetrate the system and employees are well-equipped to combat money laundering and other financial crimes.

The fight against money laundering is a never-ending and ever-changing process. At the Company, we recognize that preventing money laundering and identifying potential terrorist financing activities involves constant vigilance and the ability to keep up with criminals' sophisticated schemes. We acknowledge that we must constantly work to identify and understand the potential risks of money laundering and terrorist financing and implement appropriate processes to mitigate and eliminate such risks.

Funds Withdrawal Procedure

The withdrawal procedure at The Company detailed below follows the strict principle that ensures funds are securely remitted back to their originating source.

- The Company customers must complete a signed paper or digital withdrawal request containing inter alia, their correct account information.
- The withdrawal form must be submitted to the Company Finance department for processing. The Finance department will confirm the account balance, verify that there are no holds or withdrawal restrictions on the account, and then approve the withdrawal request, pending compliance approval.
- The Company's Compliance department reviews all withdrawal requests approved by the Finance department, verifying that the original funds are being withdrawn through the same method of deposit and to the name of the account holder on file.
- The Compliance department will also examine the withdrawal request against the customer's deposit history to ensure there is no suspicious activity, and if none verifies the bank account details held on file.
- Withdrawal requests approved by the Company Compliance department are sent back to the Finance department, and the funds are released to the client.
- In the event that a withdrawal is flagged for suspicious activity, the withdrawal is placed on hold, pending further investigation by The Company management.
- The Company Management will decide if further action is needed and which, if any, relevant regulatory bodies need to be contacted.

Compliance Footnote

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The compliance procedure related to AML listed above is only a brief summary of the compliance function guidelines followed by Volity Trade Ltd.'s compliance team. A detailed copy of our compliance policy is available for qualified institutions, regulatory bodies, and related counterparties. For additional questions concerning The Company policies, please contact our Compliance department. No substitutions or modifications will be accepted to the requirements above. Volity Trade Ltd.'s Compliance department reserves the final determination regarding the validity of these documents.

Clients should assume that all information provided to the Company is available to the competent regulatory authorities in (a) the country of incorporation of the Company, i.e. St. Lucia; (b) the country of origin of any funds transmitted to The Company; and (c) the destination country of any funds refunded by or withdrawn from the Company.

The Company does not want your business if your funds are sourced from criminal activities or if the nature of your account transactions is illegal in any manner whatsoever.

The Company reserves the right to review and/or amend its Money Laundering Prevention Policy, at its sole discretion, whenever it deems fit or appropriate.

Our AML Policy is a policy only, it is not part of our Terms and Conditions of Business and is not intended to be contractually binding.