



Volity Trade Ltd.

Company Number 2024-00059

Rodney Bay, Gros Islet, St. Lucia

CLIENT ACCEPTANCE POLICY

AUGUST 2026



Last Revision Date:	19.08.2026
Version:	1

Client Acceptance Policy

1. Introduction and Purpose

This Client Acceptance Policy (the “Policy”) sets out the criteria and procedures applied by Volity Trade Ltd (the “Company”, “we”, “us” or “our”), a company registered in St. Lucia with registration number 2024-00059, when deciding whether to accept a prospective client and open a trading account. The Policy is designed to ensure that the Company establishes business relationships only with clients who meet its eligibility, identification and risk requirements, and to support the Company’s obligations in relation to the prevention of money laundering and terrorist financing.

2. Eligibility Criteria

To be accepted as a client of the Company, a prospective client must, at a minimum:

- be at least eighteen (18) years of age and have full legal capacity to enter into a binding agreement;
- not be a resident or national of, or otherwise connected with, any restricted jurisdiction identified by the Company;
- provide valid government-issued photographic identification and a recent proof of residence;
- successfully complete the Company’s identity verification and account-opening procedures;
- provide information regarding the source of their funds where requested; and
- accept the Company’s Client Agreement and related policies.

3. Restricted Clients and Jurisdictions

The Company does not accept, and will not knowingly establish or maintain a business relationship with, any of the following:

- persons who are residents or nationals of, or connected with, restricted jurisdictions, including the United States, North Korea, Iran, Myanmar, Cuba, Sudan and Syria;
- individuals or entities that are subject to applicable sanctions, including United Nations, OFAC and European Union sanctions, or any sanctions adopted by St. Lucia;
- persons who refuse or fail to provide the identification or information required by the Company; and
- persons whom the Company reasonably believes to be acting on behalf of an undisclosed third party, or whose funds the Company reasonably believes to be derived from unlawful activity.

Politically Exposed Persons (PEPs), their family members and close associates may only be accepted with the approval of senior management and following the application of enhanced due diligence.

4. Customer Due Diligence

The Company applies a risk-based approach to customer due diligence. Before accepting a client, and on an ongoing basis thereafter, the Company verifies the identity of the client and, where applicable, of any beneficial owner, and assesses the money laundering and terrorist financing risk associated with the relationship. Clients are classified as low, medium or high risk, and the level of due diligence applied is adjusted accordingly. Enhanced due diligence is applied to higher-risk clients, including PEPs and clients

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connected with higher-risk jurisdictions. Further detail is set out in the Company's Anti-Money Laundering Policy.

5. Grounds for Refusal

The Company may, at its sole discretion and without being required to provide reasons, decline to accept any prospective client. Grounds for refusal include, without limitation, a failure to meet the eligibility criteria, a failure to complete verification, a connection with a restricted jurisdiction or sanctioned person, the identification of an unacceptable level of risk, or any concern that the relationship may be connected with money laundering, terrorist financing or other unlawful activity.

6. Ongoing Monitoring

Acceptance as a client is not permanent. The Company monitors client accounts and transactions on an ongoing basis and may suspend, restrict or terminate a business relationship where a client no longer meets the Company's acceptance criteria, where required information is not maintained, or where the Company identifies suspicious or unlawful activity.

7. Record Keeping

The Company retains records relating to client acceptance, identification and due diligence for a minimum period of five (5) years from the termination of the business relationship, or for such longer period as may be required by applicable law.

8. Amendments

The Company reserves the right to review and amend this Policy at its sole discretion whenever it deems appropriate. The current version of this Policy is available on the Company's website.