

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

For Omix Capital a Saint Lucia-registered Forex Brokerage

1. Purpose of the Policy

This Anti-Money Laundering (AML) and Counter-Terrorist Financing (CTF) Policy establishes the framework, principles, and procedures adopted by the Company to prevent, detect, and report money laundering, terrorist financing, and other financial crimes in accordance with the laws and regulations of Saint Lucia.

The Company is committed to:

- Preventing misuse of its services for money laundering or terrorist financing
- Complying with all applicable AML/CFT laws and international standards
- Maintaining robust internal controls and risk-based procedures

2. Regulatory & Legal Framework (Saint Lucia)

This policy is designed in accordance with, but not limited to, the following:

- **Money Laundering (Prevention) Act, Cap. 12.20** of Saint Lucia
- **Proceeds of Crime Act**
- **Anti-Terrorism Act**
- **Financial Intelligence Authority (FIA) Act**
- Guidance issued by the **Financial Intelligence Authority (FIA) of Saint Lucia**
- FATF (Financial Action Task Force) Recommendations

3. Scope of Application

This policy applies to:

- The Company, its directors, officers, employees, and agents
- All clients (retail, professional, institutional)
- All products and services including:

 - Forex trading accounts
 - CFDs and derivatives
 - Deposits and withdrawals
 - Introducing brokers and affiliates

4. Definitions

- **Money Laundering:** The process of concealing the origin of illicit funds.
- **Terrorist Financing:** Providing or collecting funds for terrorist acts.
- **Customer Due Diligence (CDD):** Identification and verification of clients.
- **Enhanced Due Diligence (EDD):** Additional checks for high-risk clients.

- **PEP:** Politically Exposed Person.
 - **STR:** Suspicious Transaction Report.
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5. AML Governance Structure

5.1 Board of Directors

- Approves and oversees AML/CFT policy
- Ensures adequate resources and independence of compliance function

5.2 Money Laundering Reporting Officer (MLRO)

The Company shall appoint a qualified **MLRO** who shall: - Oversee AML/CFT compliance - Review suspicious activities - File STRs with the Saint Lucia FIA - Act as liaison with regulators and law enforcement - Maintain AML records

6. Risk-Based Approach

The Company adopts a **risk-based approach** by assessing:

6.1 Customer Risk

- Country of residence
- Occupation and source of funds
- PEP status
- Trading behavior

6.2 Geographic Risk

- FATF high-risk and non-cooperative jurisdictions
- Sanctioned countries

6.3 Product & Transaction Risk

- High-frequency transactions
 - Large deposits or withdrawals
 - Third-party payments
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7. Customer Due Diligence (CDD)

7.1 Identification Requirements – Individuals

Before account activation, the Company shall obtain: - Full legal name - Date of birth - Nationality - Residential address - Valid government-issued photo ID (passport, national ID) - Proof of address (utility bill, bank statement – not older than 3 months)

7.2 Identification Requirements – Corporate Clients

- Certificate of incorporation
 - Memorandum & Articles of Association
 - Register of directors and shareholders
 - Ultimate Beneficial Owner (UBO) details ($\geq 25\%$)
 - Board resolution authorizing account opening
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8. Enhanced Due Diligence (EDD)

EDD is applied when dealing with: - PEPs and close associates - High-risk jurisdictions - Large or unusual transaction patterns

EDD measures include: - Source of wealth verification - Senior management approval - Ongoing enhanced monitoring

9. Ongoing Monitoring

The Company shall: - Monitor trading activity and fund movements - Review accounts periodically based on risk rating - Use automated and manual surveillance tools - Re-verify client documents when required

10. Suspicious Transaction Reporting (STR)

10.1 Identification of Suspicious Activity

Examples include: - Unusual deposit/withdrawal behavior - Inconsistent source of funds - Rapid movement of funds with no trading rationale - Third-party payments

10.2 Reporting Procedure

- Employees must report suspicions to the MLRO immediately
- MLRO evaluates and files STR to **Saint Lucia FIA** without tipping off the client
- Records of STRs must be retained securely

11. Record Keeping

The Company shall retain records for **minimum 7 years**, including: - Client identification documents - Transaction records - STR filings and internal reports - Training records

12. Sanctions & PEP Screening

The Company conducts screening against: - UN sanctions lists - OFAC and EU sanctions lists - PEP databases

Clients identified on sanctions lists are prohibited from onboarding.

13. Employee Training

- Mandatory AML/CFT training at onboarding
 - Annual refresher training
 - Specialized training for compliance staff
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14. Internal Controls & Audit

- Independent AML audit periodically
 - Regular review of AML procedures
 - Immediate remediation of identified weaknesses
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15. Data Protection & Confidentiality

All AML information shall be: - Kept confidential - Used only for compliance purposes - Disclosed only to competent authorities when legally required

16. Non-Compliance & Disciplinary Measures

Failure to comply with this policy may result in: - Disciplinary action - Termination of employment - Regulatory reporting

17. Policy Review & Updates

This AML/CFT Policy shall be:

- Reviewed annually
- Updated based on regulatory changes or risk exposure
