

Fintrix Markets (Saint Lucia) Ltd

Anti-Money Laundering (AML)

Company Name: Fintrix Markets (Saint Lucia) Ltd

Registration Number: 2025-00060

Place of Incorporation: Saint Lucia

Date of Policy Approval: 12 February 2025



1. Introduction

This AML Policy outlines Fintrix Markets (Saint Lucia) Ltd's (hereafter referred to as the "Company" and/or "Fintrix Markets" and/or "we" and/or "us" and/or "our") commitment to preventing the use of its services for money laundering and terrorist financing. We are committed to full compliance with Saint Lucia's regulations, including the Proceeds of Crime Act and other relevant international guidelines.

2. Definitions

- Money Laundering: The process of making illegally-gained proceeds appear legal.
- Terrorist Financing: The act of providing financial support to terrorist organizations or individuals engaged in terrorism.
- Customer Due Diligence (CDD): Procedures used to identify and verify the identity of clients.

3. Regulatory Framework

Fintrix Markets adheres to the laws and regulations of Saint Lucia, including the Money Laundering Prevention Act (MLPA) and any relevant regulations set forth by the Financial Services Regulatory Authority (FSRA) of Saint Lucia. The company ensures its operations comply with international AML standards.

4. Customer Due Diligence (CDD)

- Identification: All clients must provide valid identification documents (passport or national ID), proof of address, and other required documents before they can access our services.
- Verification: The information provided by clients will be verified through independent and reliable sources.
- Ongoing Monitoring: All customer accounts will be monitored regularly to detect any suspicious activities.

5. Enhanced Due Diligence (EDD)

- Additional scrutiny will be applied to high-risk clients, including those from high-risk countries or politically exposed persons (PEPs). In such cases, the company may require further documentation and implement stricter monitoring protocols.

6. Transaction Monitoring

- Fintrix Markets monitors all transactions to identify unusual patterns or activities, including unusually large or frequent transactions. Suspicious activities will be escalated to the Compliance Officer and, if necessary, reported

to the relevant authorities in Saint Lucia.

7. Reporting Obligations

- All suspicious transactions or activities will be reported to the Financial Intelligence Authority (FIA) of Saint Lucia. Employees are required to report any suspicious activity to the company's Compliance Officer, who is responsible for filing Suspicious Activity Reports (SARs).

8. Record Keeping

- All records of customer identification, transaction details, and any reports filed will be kept for a minimum of 7 years following the termination of the business relationship.

9. Internal Controls and Training

- Internal Controls: The Compliance Officer is responsible for ensuring adherence to the company's AML policies and procedures.
- Training: Employees will undergo regular training on AML laws, company policies, and how to recognize and report suspicious activities. Training is mandatory upon joining the company and on an annual basis.

10. Penalties for Non-Compliance

Failure to comply with this policy may result in disciplinary action for employees, which could include termination of employment. Non-compliance by the company can result in regulatory sanctions, fines, or loss of license