onequity

# AML Policy

NOVEMBER 2025

**OnEquity (PTY) LTD**
FSCA License
No. 53187

## 1. Introduction

“**Entity and Regulatory Framework:** ONEQUITY (PTY) LTD (hereinafter referred to as "the Company"), with registration number 2021/321834/07, is regulated by the Financial Sector Conduct Authority (FSCA) under license number 53187. The Company trades under the name OnEquity.

**Compliance Commitment:** This policy aligns with the Financial Intelligence Centre Act, 2001 (FIC Act), the Prevention of Organised Crime Act, 1998 (POCA), the Prevention and Combating of Corrupt Activities Act, 2004 (PRECCA), and the Protection of Constitutional Democracy Against Terrorist and Related Activities Act, 2004 (POCDATARA). It encapsulates the Company's dedication to preventing, identifying, and mitigating money laundering and terrorist financing risks.

## 2. Client Acceptance Policy

Cl**ient Due Diligence (CDD):** Essential for managing money laundering and terrorist financing risks, CDD encompasses identifying and verifying clients' identities based on reliable, independent source documents, data, or information.

**Documentation and Verification:**
For Individual Clients: Includes name, date of birth, residence, and contact details.

For Corporate Clients: Involves company name, registration, incorporation details, registered address, and identification of directors and ultimate beneficial owners (UBOs).

Verification Documents: May encompass government-issued IDs, utility bills, bank statements, and corporate documentation.

**Enhanced Due Diligence (EDD):** For high-risk clients, EDD involves deeper inquiries into the source of funds or wealth, alongside regular reviews of the business relationship.

## 3. Policies, Controls, And Procedures

**Risk Management:** The Company adopts a risk-based approach to AML/CFT, incorporating risk assessment and management strategies to identify areas of high risk and apply appropriate measures.

**Risk Disclosure**: Trading in financial instruments involves substantial risk and may not be suitable for all investors. The value of investments is volatile and can result in total loss of capital. Investors should consider their financial situation, investment experience, and risk tolerance, and may seek professional advice. Past performance is not indicative of future results.

**Monitoring and Reporting:** Continuous monitoring of client transactions is mandated, with procedures in place for reporting suspicious activities to relevant authorities in compliance with the FIC Act.

## 4. Refund Policy

Integral to the AML framework, the Refund Policy outlines the conditions under which refunds are processed, ensuring measures are in place to prevent money laundering and terrorist financing.

## 5. Personnel And Training

**AML Compliance Officer:** Tasked with the overall responsibility for the AML/CFT program, reporting to the Company's Board or a designated committee.

**Employee Training:** Comprehensive training programs are established for employees, particularly those in client-facing roles, to understand and implement AML/CFT measures effectively.

## 6. Record-Keeping And Data Protection

**Record-Keeping:** The Company maintains accurate and up-to-date records of client identification, transactions, and reports filed, ensuring compliance with the FIC Act's record-keeping requirements.

**Data Protection:** Adherence to data protection laws is paramount, with safeguards in place to protect client information against unauthorized access or disclosure.

## 7. Internal Controls And Audit

**Internal Controls:** Robust internal controls are implemented to ensure compliance with AML/CFT policies, including regular reviews of the effectiveness of these controls.

**Independent Audit:** An independent audit function is established to assess the adequacy and effectiveness of the Company's AML/CFT measures.

## 8. Compliance With International Standards

The Company commits to adhering to international AML/CFT standards and best practices, including those set by the Financial Action Task Force (FATF).

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## 9. Policy Review And Updates

**Regular Review:** This policy is subject to regular review and updates to reflect changes in legislation, regulatory guidance, and operational practices.

**Updates:** Amendments to the policy are communicated to all affected parties promptly to ensure continued compliance and effectiveness of the AML/CFT program.

## 10. Conclusion

Through the implementation of this comprehensive AML policy, the Company reaffirms its commitment to legal and regulatory compliance, safeguarding the integrity of financial transactions and contributing to the global efforts against money laundering and terrorist financing.

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