onequity

AML Policy

JUNE 2026

OnEquity Ltd
FSA License
No. SD154

1. Introduction

1.1. Entity and Regulatory Framework: ONEQUITY Ltd (the "Company"), Securities Dealer No. 154, is subject to the Anti-Money Laundering and Counter-Financing of Terrorism regime of the Republic of Seychelles. This Policy aligns with the Proceeds of AML and CFT Act, 2020 (as amended), the AML Regulations, the Prevention of Terrorism Act, 2004 (as amended), and applicable guidance/circulars issued by the Financial Services Authority (FSA) of Seychelles.

1.2. Purpose: This Policy sets out the Company's commitments to prevent, detect and report money laundering and terrorist financing, and establishes internal responsibilities, controls, and procedures consistent with FATF Recommendations.

1.3. Scope: This Policy applies to all business units, employees, contractors and affiliates when performing activities for or on behalf of the Company.

2. Definitions

2.1. Unless the context requires otherwise, terms have the meanings commonly used in Seychelles' AML/CFT legislation and FATF terminology, including:

- "Act": Proceeds of AML and CFT Act, 2020 (as amended), associated Regulations, the Prevention of Terrorism Act, 2004 (as amended), and FSA circulars/guidance.
- "AML/CFT Compliance Officer" and "AML/CFT Reporting Officer": individuals appointed under the Regulations with responsibility for compliance and reporting duties.
- "Beneficial Owner": the natural person(s) who ultimately owns or controls a legal person/arrangement or on whose behalf a transaction is conducted, whether ownership/control is direct or indirect.
- "Business Relationship": a professional or commercial relationship with an element of duration expected by the Company at onboarding.
- "Customer Due Diligence (CDD) Measures": identification and verification of the customer and, where applicable, third parties and beneficial owners; understanding the purpose and intended nature of the relationship/transaction; and ongoing monitoring.
- Other defined terms include: Director; PEP (domestic/foreign/international organization); Intermediary; Introducer; Legal Person; Occasional Transaction; Ongoing Monitoring; Relationship Information.

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.

3. Policies, Procedures, Systems, and Controls

3.1 The Company maintains risk-sensitive policies, procedures, systems and controls addressing CDD and monitoring, reporting, record-keeping, employee screening, internal controls, risk assessment and management, and compliance oversight and communication.

3.2 3.2. Identification and scrutiny cover complex/unusually large transactions, unusual patterns without apparent lawful purpose, and other activity potentially related to ML/TF. Additional measures are taken to prevent misuse of products susceptible to anonymity.

3.3 Sanctions and High-Risk Countries: The Company determines whether customers, third parties or beneficial owners are PEPs, and whether relationships/transactions involve jurisdictions that insufficiently apply FATF standards or are subject to UN/EU/other sanctions.

4. Client Acceptance and Customer due Diligence

4.1. General: The Company obtains CDD information for every customer, relevant third party and beneficial owner, and verifies identity using reliable, independent sources before establishing a Business Relationship or executing an Occasional Transaction.

4.2. Timing: CDD must be completed prior to onboarding or transaction execution. In limited, low-risk cases where business continuity requires, verification may be completed as soon as practicable after initial contact; failure to complete verification will result in relationship termination.

4.3. Triggers: CDD is refreshed when doubts arise as to the adequacy or veracity of documents/data, when conducting ongoing monitoring, or when there are changes to identification information, beneficial ownership, or third-party arrangements.

4.4. Ongoing Monitoring: The Company scrutinizes transactions to ensure consistency with the customer’s profile and keeps CDD information up-to-date on a risk-sensitive basis, with at least annual review for low-risk customers. If ongoing monitoring cannot be performed, the relationship will be terminated.

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5. Risks-Based Approach (RBA)

5.1. Application: The Company applies a risk-sensitive approach to determine the extent/nature of CDD and ongoing monitoring for each relationship/transaction.

5.2. Assessment: For each customer, the Company prepares and records a risk assessment considering customer, product/service, delivery channel, and country/geographic risks, and updates it periodically based on new information.

5.3. Enhanced Measures: Enhanced due diligence and enhanced ongoing monitoring are applied where higher risks exist (e.g., connections to jurisdictions that do not sufficiently apply FATF standards, PEP involvement, private banking, asset-holding vehicles, , or other higher-risk scenarios).

5.4. Non-Face-to-Face: At least one additional check to mitigate identity fraud is performed and further measures are applied as appropriate.

6. Prohibited or Restricted Accounts

6.1. The Company does not approve numbered or anonymous accounts, or accounts in fictitious names, nominee shareholders/bearer shares.

7. Reliance on Introducers and Intermediaries

7.1. Conditions: The Company may rely on a regulated introducer/intermediary that consents to reliance, provided it obtains immediate access to CDD information and written assurances that: (i) required CDD was performed; (ii) identification evidence is retained; and (iii) records will be provided without delay upon request.

7.2. Assurance & Oversight: Prior to reliance, the Company confirms regulated status and assesses reliance risk to determine whether additional measures are needed. Sufficient information must be obtained to assess ML/TF risk of each introduced customer.

8. Record-Keeping

8.1. The Company keeps records of risk assessments, CDD information and evidence of identity, relationship/transaction documentation sufficient to reconstruct transactions, account files, and business correspondence, ensuring timely retrieval for competent authorities. Records are maintained to facilitate ongoing monitoring and audits.

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9. Monitoring, Testing, and Access to Information

9.1. The Company maintains procedures to monitor and test the effectiveness of AML/CFT policies and training. The AML/CFT Compliance Officer and appropriate staff have timely access to CDD and transaction records necessary to perform their duties.

10. Employee Awareness and Training

10.1. Employees are trained on Company AML/CFT policies and relevant laws, including identification and handling of transactions or behaviours indicative of ML/TF.

11. Client's Risk-Based KYC and National / International Context

11.1. Risk assessment considers national legal/regulatory frameworks, prescribed significant risks and mitigation measures, and FATF Recommendations. Quantitative and qualitative data (e.g., typologies, red flags, guidance from authorities and inter-governmental bodies) inform the assessment.

12. ML/TF Risk Indicators

12.1. Indicators considered include business nature and complexity; proportion of high-risk customers; jurisdictions of operation/exposure (including crime/corruption/TF prevalence, AML/CFT regime, beneficial ownership transparency, supervisory effectiveness); distribution channels and intermediation; technology use; audit and regulatory findings; and expected transaction volumes and sizes.

13. Customer Risk Categorization

13.1. High-Risk: Factors may include PEP status (including family/close associates / UBO PEPs); residence or source of wealth in high-risk jurisdictions; lack of tax transparency; unwillingness/inability to provide third-party/BO documentation; negative media; links to typologies/red flags; unregistered or weakly supervised intermediaries; cash-intensive businesses; or regulatory sanctions without remediation. As per the FATF list dated 19 June 2026, customers resident in Angola, Bolivia, Bosnia and Herzegovina, Bulgaria, Cameroon, Côte d'Ivoire, DRC, Haiti, Iraq, Kenya, Lao PDR, Lebanon, Monaco, Nepal, South Sudan, Syria, Venezuela, Vietnam, Virgin Islands (UK), and Yemen are automatically classified as high-risk (subject to updates).

13.2. Low-Risk: Examples include listed companies subject to robust disclosure; public

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authorities; customers resident in lower-risk jurisdictions with effective AML/CFT; or products with limited services/amounts and transparent ownership (e.g., certain e-money).

13.3. Normal/Medium-Risk: Customers not falling within high- or low-risk categories.

14. Due Diligence for Individuals / Representatives

14.1. At minimum: clear colour copy of a valid passport/official national ID; and proof of permanent residential address (e.g., utility bill, local authority tax bill or bank statement issued within the last six months, showing full name and address). Documents not in English must be accompanied by a translation (dated, signed and stamped by the translator).

14.2. Purpose and Intended Nature: Obtain information sufficient to understand the purpose/intended nature of the relationship; in higher-risk cases, obtain additional information to support ongoing monitoring and detect suspicious activity.

14.3. Proportionality: The extent of information and verification increases with risk and may be simplified where risk is demonstrably lower, subject to legal allowances. Risk profiles are periodically updated to calibrate CDD.

15. Due Diligence for Corporate Customers

15.1. Information and Understanding: Obtain sufficient information to understand the customer's business, reputation and supervisory quality, including assessment of AML/CFT controls where appropriate.

15.2. Minimum Documentation (certified true copies): Certificate of Incorporation and Good Standing; Registered Office; Directors/Secretary; Shareholders; Memorandum & Articles; Board Resolution authorizing account opening and operators; trust/nominee documentation where applicable; identification of authorized signatories, registered shareholders and beneficial owners; latest audited financial statements and/or management accounts (if available). The Company may request additional information where necessary.

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16. Sanctions Screening

16.1. The Company complies with national and international sanctions legislation. Sanctions screening is mandatory. Where customers (natural or legal) are from sanctioned countries, or are sanctioned individuals, the Company will not conduct business.

17. Refusal or Termination of Business Relationships

17.1. Where the Company cannot apply CDD prior to establishing a relationship or executing an occasional transaction, it will not proceed with establishing the business relationship. If ongoing monitoring cannot be performed, the relationship will be terminated.

18. Reporting of Suspicious Activity

18.1. Suspicious activity is escalated to the AML/CFT Reporting Officer for consideration and, where appropriate, reported to the competent authority in accordance with applicable laws and guidance.

Note: This Policy must be read in conjunction with applicable Seychelles AML/CFT laws/regulations and FATF standards. Where legislative amendments occur, this Policy shall be interpreted to maintain compliance without altering customer rights or obligations beyond statutory requirements.

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