# Anti-Money Laundering and Know Your Customer (AML/KYC) Policy

**Orax Capital Markets Ltd**, an International Business Company incorporated in Saint Lucia under No. 2026-00699. Registered address: Unit 1, La Place Creole Building, Rodney Bay, Gros-Islet, Saint Lucia, LC01 101. Website: https://www.oraxbroker.com. Contact: support@oraxbroker.com.
Last updated: November 2026

## 1. Purpose and scope

Orax Capital Markets Ltd ("Orax", "we", "us") offers online trading in foreign exchange (forex) and contracts for difference (CFDs) on metals, commodities, indices and cryptocurrencies, as well as fixed-time (digital/binary) options, through https://www.oraxbroker.com.

This Policy sets out how we prevent our services from being used for money laundering, terrorist financing, sanctions evasion or fraud. It applies to every client, every account and every deposit and withdrawal, and to all our staff and service providers.

We follow the Money Laundering (Prevention) Act of Saint Lucia and related regulations, and we take into account the recommendations of the Financial Action Task Force (FATF).

## 2. Compliance Officer

We have appointed a Compliance Officer who is responsible for this Policy. The Compliance Officer:

- approves high-risk clients and enhanced due diligence files;
- reviews alerts on suspicious transactions and decides whether to file a report with the competent authority in Saint Lucia (Financial Intelligence Authority);
- keeps the Policy and the internal risk assessment up to date, at least once a year;
- trains staff on AML/KYC procedures;
- is the point of contact for payment processors, banks and authorities.

The Compliance Officer can be reached through support@oraxbroker.com (subject line: "Compliance").

## 3. Client acceptance

We do not open accounts for:

- persons under 18 years of age or without legal capacity;
- anonymous persons or persons using false or fictitious names;
- persons or entities listed on sanctions lists, or owned or controlled by them;
- residents of jurisdictions on the FATF list of high-risk jurisdictions subject to a call for action, or of countries where our services are restricted (including the United States, Canada, Saint Lucia, North Korea, Iran and other countries we list on our website from time to time);
- shell banks, or persons whose source of funds we cannot reasonably establish.

Each client may hold only one account. Duplicate accounts are closed.

## 4. Identity verification (KYC)

We verify every client in-house before any withdrawal is processed. We may also require verification earlier, for example when deposits reach a set threshold or when our risk checks flag the account.

Documents we request:

- Proof of identity: a valid passport, national identity card or driving licence, in colour, showing full name, date of birth, photo and expiry date.
- Proof of address: a utility bill, bank statement or official letter issued within the last 3 months, showing full name and residential address.
- Proof of payment method: for cards, a photo of the front with only the first 6 and last 4 digits visible and the CVV covered; for e-wallets or bank transfers, a screenshot or statement showing the account holder name.
- A selfie or live photo holding the identity document, where we need to confirm that the person matches the document.

Our team checks documents for tampering, expiry and consistency with the data given at registration. We aim to complete a review within 1 to 2 business days of receiving complete documents.

## 5. Sanctions and PEP screening

Every client is screened at onboarding, before each withdrawal, and periodically after that against consolidated sanctions and watch lists, including the data published by OpenSanctions (which aggregates UN, EU, UK, US OFAC and other lists) and politically exposed person (PEP) data.

A possible match is reviewed by the Compliance Officer. A confirmed sanctions match means the account is blocked, no funds are released, and we report as required by law. A PEP is not refused automatically but goes through enhanced due diligence and needs Compliance Officer approval.

## 6. Risk-based approach and enhanced due diligence

We give each client a risk rating (low, medium or high) based on country of residence, deposit volume, payment methods, PEP status, trading behaviour and other factors.

For high-risk clients we apply enhanced due diligence, which can include proof of source of funds or source of wealth (payslips, tax returns, bank statements, company documents), additional identity checks, and closer monitoring of transactions.

## 7. IP and device matching

We record the IP address, approximate location and device data used to register, log in, deposit and withdraw. We compare them with the country the client declared and with the details of other accounts.

We investigate, and may block, accounts where:

- the IP country does not match the declared country of residence without a reasonable explanation;
- VPNs, proxies or anonymising networks are used to hide location;
- several accounts share the same device, IP address or payment method;
- access comes from a restricted country.

## 8. Transaction monitoring and suspicious activity

Our systems and staff monitor deposits, withdrawals and trading. Examples of activity we flag for review:

- deposits followed by withdrawal with little or no trading;
- deposits from third parties or from payment methods in another person's name;
- many small deposits that appear designed to stay under verification thresholds;
- frequent changes of payment method or withdrawal details;
- deposit amounts that do not fit the client's declared income or profile;
- trading that looks coordinated between accounts or designed to transfer value between them.

Flagged activity is escalated to the Compliance Officer. Where there are grounds for suspicion we may suspend the account, hold funds, ask for further documents and file a suspicious activity report with the competent authority. By law we may not tell the client that a report has been filed.

## 9. Deposits and withdrawals

- Deposits must come from an account or card in the client's own name. We do not accept third-party payments.
- Withdrawals are paid only to the client, and as a rule back to the same method used for the deposit, up to the amount deposited. Profits above that amount are paid to a bank account or e-wallet in the client's name.
- Withdrawals are released only after KYC is complete and the client has passed sanctions screening.
- We do not accept cash.

## 10. Record keeping

We keep identity documents, transaction records and related correspondence for at least 7 years after the business relationship ends, or longer if the law requires it.

## 11. Staff training and review

Staff who deal with clients or payments are trained on this Policy when they join and at least once a year. The Compliance Officer reviews this Policy at least once a year and when laws or our services change.

## 12. Client cooperation

By opening an account, clients agree to provide accurate information and documents when asked and to tell us of any change. If a client refuses or fails to provide requested documents, we may refuse a transaction, suspend the account or close it and return remaining funds to the original payment method, after any deductions the law requires. Questions about this Policy can be sent to support@oraxbroker.com.

© 2026 Orax Capital Markets Ltd. All rights reserved.