Anti-Money Laundering Policy

v1.0 November 2025

1. **Introduction**

1.1. Aurra Markets International Limited (referred to as "Aurra" or the "Company") authorised and regulated as a Sait Lucia International Business Company under License 2025-00208.

1.2. This policy is applicable to all employees of the Company and individuals or entities (referred to as "Client") who are serviced by the Company.

1.3. The Company is obligated to detect, prevent, and report against money laundering in all aspects of business operations by deploying relevant measures and procedures in accordance with the applicable law.

1.4. This policy is not intended to be contractually binding, impose, or seek to impose any obligation on to the Company but in accordance with applicable laws and regulation on preventing the use of financial system for the purpose of money laundering as defined within to the clauses outlined in section 3.

2. **Definition**

2.1. Money laundering is defined as the process undertaken by the individual or entity to conceal the origins of unlawfully obtained money or other assets that has monetary value by transferring it via businesses or financial institutions whereby its origin is deceived to be obtained from a legitimate source.

2.2. Money laundering may include but not limited to the following classification of assets that has monetary value:

2.2.1. Cash

2.2.2. Securities

2.2.3. Tangible property

2.2.4. Intangible property

2.3. Derived acts and intention of money laundering may include but not limited to:

2.3.1. Acquisition, possession, or usage of unlawfully obtained assets.

2.3.2. Facilitation or involvement in unlawfully obtained assets with its source derived from theft, fraud, kleptocracy, and tax evasion.

2.3.3. Colluding with criminal or terrorism with involvement of its unlawfully obtained assets.

2.3.4. Arrangement of procedures undertaken to launder unlawfully obtained assets.

2.3.5. Ownership transfer of unlawfully obtained assets.

2.4. Money laundering may follow the following procedures:

2.4.1. Disposal of unlawfully obtained assets into the business or financial institution.

2.4.2. Disguise the origin of the unlawfully obtained assets through a series of financial transactions with the purpose of disguising its origin and legitimacy.

2.4.3. Removal of unlawfully obtained assets from the business or financial institution following a succession in disguising its origin and legitimacy.

3. Measures

3.1. An Anti-Money Laundering Compliance department is established within the Company that will be responsible for the detection, prevention and reporting of suspicious monetary activity to the relevant law enforcement, regulatory agencies or government body.

3.2. The Company’s Anti-Money Laundering Compliance department shall:

3.2.1. Monitor and detect suspicious monetary activity akin to money laundering.

3.2.2. Investigate reports of suspicious activity or events.

3.2.3. Reporting of suspicious activity or events to relevant authorities.

3.2.4. Conduct training on the Company’s employees with regards to money laundering.

3.2.5. Generate an annual report to the Company’s regulatory agencies on the procedures undertaken and its effectiveness.

3.3. The Client acknowledges that all information provided to the Company will be delivered to the following entities but not limited to:

3.3.1. The entities within the country of incorporation of the Company.

3.3.2. The entities within the country of origin for any funds transmitted to the Company.

3.3.3. The entities in the destination country of any funds refunded or remitted from the Company.

3.4. The Client acknowledges that the Company may, at which ever stage during the delivery of service, request for additional information to verify the identity and legitimacy of the fund, deposited with or remitted from the Company but not limited to:

3.4.1. Full Name

3.4.2. Residential Address

3.4.3. Proof of bank account

3.4.4. Taxation records

3.4.5. Official documents issued by the government

3.5. The Company reserves the right to take the following measures over suspicion of money laundering but not limited to:

3.5.1. Freezing of accounts.

3.5.2. Refusal of service.

3.5.3. Termination of account.

3.6. Pertaining to clause 3.5, the Client acknowledges that the Company may channel remaining funds in the account to the relevant entities as listed in clause 3.3 in the event of a proven money laundering activity.

3.7. The Company may raise suspicion over the Client should the following scenarios arises but not limited to:

3.7.1. Reluctance or refusal to provide relevant documents for identifying or transaction verification.

3.7.2. Divergence in transaction behaviour.

3.7.3. Inadequate information provided to prove source of funds.

3.7.4. Failure to justify the divergence in transaction behaviour.

3.7.5. Extensive activity of transaction executed either internally and/or externally.

3.7.6. Inconsistency in terms of magnitude of funds with the client’s prior activity with the Company or personal background.

4. Record Keeping

4.1. The Company reserves the right to retain all information of the Client that will be made retrievable without undue delay and submitted to the relevant entities as outlined in clause 3.3.

5. Amendments

5.1. All clauses within this document are subject to periodic updates and the Client is deemed to acknowledge any modifications to this document after the updated copy is made available to the public at any medium.

5.2. Should inconsistency arise between different language version of all policy, terms and conditions or agreements, the English version shall supersede and prevail.

6. Enquiries

6.1. For enquiries with regards to this document, the Client may contact the Company by emailing dedicated customer support at support@aurra.markets.