

## Anti-Money Laundering policy

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## ANTI-MONEY LAUNDERING POLICY INTRODUCTION

Vixotrade.com is operated by Luxon LTD incorporated in the St.Lucia under registered number No.2025-00541 by the registrar of International Business Companies with its registered office address at Fortgate Offshore Investment and Legal Services Ltd. Ground Floor, The Sotheby Building, Rodney Village, Rodney Bay, Gros-Islet, Saint Lucia

Centre Act, 2001 (Act No. 38 of 2001) as amended by the Protection of Constitutional Democracy against Terrorist and Related Activities Act, 2004 (Act No. 33 of 2004), the Financial Intelligence Centre Amendment Act, 2008 (Act No. 11 of 2008), the General Intelligence Laws Amendment Act, 2013 (Act No. 11 of 2013), the Financial Intelligence Centre Amendment Act, 2017 (Act No. 1 of 2017) and the Financial Sector Regulation Act, 2017 (Act No. 9 of 2017).

Vixotrade also follows the Financing Control Regulations, under Money Laundering and Terrorist Financing Control Regulations, 2002, published in Government Notice No. R. 1595 of 20 December 2002 as amended by GN R456 in Government Gazette 27580 of 20 May 2005 and GN R867 in Government Gazette 33596 of 1 October 2010 and GN 1107 in Government Gazette 33781 of 26 November 2010 and GN R.1062

in Government Gazette 41154 of 29 September 2017. The Minister of Finance has, in terms of section 77 of the Financial Intelligence Centre Act, 2001 (Act No. 38 of 2001), made the regulations set out in the Schedule.

Furthermore, Vixotrade is operating in line with the FATF Recommendations. The Financial Action Task Force (FATF) set standards and promote effective implementation of legal, regulatory, and operational measures for combating money laundering, terrorist financing and other related threats to the integrity of the international financial system. Starting with its own members, the FATF monitors countries' progress in implementing the FATF Recommendations; reviews money laundering and terrorist financing techniques and countermeasures; and promotes the adoption and implementation of the FATF Recommendations globally.

## **VIXOTRADE AML POLICY**

### **Compliance with the AML/CFT Legislation**

The Company has developed and implemented a compliance program consisting of policies, procedures, transaction monitoring systems, internal controls and personnel training in line with applicable laws and regulations, as well as with international best practices. The AML/CFT Program, which employs a risk-based approach to managing the Company's AML risk, includes, but is not limited to:

- i. Customer On-boarding Policy
  - Defining the policy and process followed during on-boarding of new clients in order to adequately follow the applicable legal and regulatory framework
- ii. Risk-based Approach
  - AML/CFT Risk Assessment and Risk Management: The establishment of a Firm Wide Risk Management Framework to identify all quantifiable AML risks (inherent risk and residual risk) and to assist the Board of Directors in defining the Company's risk appetite
  - Customer Due Diligence, which incorporates "Know your Customer" or "KYC" procedures for the identification and verification of the identity of our customers, including, where applicable, their respective beneficial owners
  - Identification and execution of enhanced due diligence measures for monitoring high-risk clients, including Politically Exposed Persons (PEPs), their relatives and close associates
  - Senior management review and approval of high-risk customers, including Politically Exposed Persons
- iii. Customers Screening
  - The adoption of policies and procedures to ensure compliance with the applicable restrictive measures (i.e. EU/UN/OFAC sanctions) and that the Company does not engage in any activity for, on behalf of, for the benefit of, any individual, entity or organization subject to sanctions or maintain a relationship with a person against whom enforcement measures are effected. In this respect,

ongoing customer screening is performed against a global collection of sanctions, Politically Exposed Persons, Adverse Media and Enforcement Data.

iv. Ongoing Monitoring of Customers and Reporting

- The establishment of systems and processes to monitor account activity and customer transactions

v. Reporting

- Creation, tracking and filing of Suspicious Activity Reports (SARs) and Suspicious Transaction Reports (STRs) to the appropriate regulatory authority where required

vi. Record Retention

- The retention of customer and transaction records for a period of five (5) years after the termination of business relationship with customers, or transaction execution date

vii. Training

- The provision of adequate and frequent AML/CFT training for Company employees, relevant to the role they undertake, for the purpose of prevention of money laundering and terrorist financing

viii. Independent Assessment

- An independent audit review function to test the adequacy of the Company's anti-money laundering policies and procedures on an annual basis

## **ACCOUNT OPENING PROCEDURES**

### **KNOW YOUR CUSTOMER POLICY**

**("KYC").**

#### **Account Opening Requirements**

- In order to open a trading account with Vixotrade, the potential client must have a permanent residence in a country not within the European Economic Area (EEA) and be over 18 years old. In addition, the steps listed below must be followed:
- complete the account opening application, which includes providing personal information (name, date of birth, etc), information relating to his/her economic profile (annual income, estimated net worth, employment status, etc.)
- complete the appropriateness test
- provide identification documents which consist of a valid form of government issued

identification and a proof of residence

! Please note that from the day of receipt of the account opening application a timeframe of 1 month is given to provide the required information and documentation. If the potential client fails to provide these within the aforementioned timeframe, the Company will decline the application and in case of any deposits, will refund the available balance back to the method used to deposit the funds.

### **Identification Documents:**

#### **1. Proof of Identity**

Following documents are accepted as a Proof of Identity:

- A valid Passport
- A valid National Identity Card
- A valid government ID, such as a Driver's License
- A valid Residence Permit

The document must be issued on your name and all information on the document including your photo must be visible.

! Please keep in mind that your Proof of Identity must be updated once the document expires.

! All photo IDs are verified through a third-party compliance software.

The Company reserves the right to ask for certified true copies of the above mentioned documents.

#### **2. Proof of Residence**

Following documents are accepted as a Proof of Residence:

- A utility or phone bill
- A bank statements

- Governmental documents such as tax bill or residence certificate

(stamped)

- Please note that your proof of residence document must be recent (not older than 6 months), show your name, permanent address and date of issue.

! Please keep in mind that your Proof of Residence must be updated at least once per year! (After the documents are provided it will be checked and accepted or rejected within 3 business days.)

The Company reserves the right to ask for certified true copies of the above mentioned documents.

Additionally, the company reserves the right to request additional documents from its clients whenever it deems necessary.

### **BANK ACCOUNT REQUIREMENTS.**

Vixotrade account holders must have a valid bank or credit card account in their name.

The bank/credit card statement must show their name and the same registered address as that shown on their application.

### **FUNDS WITHDRAWAL PROCEDURE.**

The withdrawal procedure at Vixotrade detailed below follows strict principles to ensure that the funds are sent back to their originating source.

**a.** Vixotrade customers must complete a signed paper or digital withdrawal request containing inter alia, their correct account information.

**b.** The withdrawal form must be submitted to the Vixotrade Finance department for processing. The Finance department will do the following:

- confirm the account balance
- confirm that the account is approved and the provided documents are up-to date.

- verify that there are no holds or withdrawal restrictions on the account
- verify that the original funds are being withdrawn through the same method of deposit and to the name of the account holder on file
- examine the withdrawal request against the customer's deposit history to

ensure there is no suspicious activity

- verify the bank account details held on file
- If there is no mismatch or suspicious activity the Finance Department will approve the withdrawal, and the funds are released to the client.
- In the event that the Finance Department believes there was suspicious activity on the account, the Vixotrade Anti - (AMLCO) will be informed, in order to perform further investigation.
- If the withdrawal is flagged for suspicious activity by the Vixotrade AMLCO, the withdrawal is placed on hold, and sent to the Vixotrade Management.
- Vixotrade Management along with the Vixotrade AMLCO will decide if further action is needed and which, if any, relevant regulatory bodies need to be contacted.

! Please note that your trading account must be verified in order for the withdrawal to be processed!

#### COMPLIANCE FOOTNOTE.

The compliance procedure related to AML listed above is only a brief summary of the compliance function guidelines followed by the Vixotrade Compliance Team. A detailed copy of our Compliance Policy is available for qualified institutions, regulatory bodies and related counterparties.

No substitutions or modifications will be accepted to the requirements above. The Vixotrade Compliance Department reserves the final determination regarding the validity of these documents.

1. Clients should assume that all information provided to the Company is available to the competent regulatory authorities in the country of incorporation of the Company;
2. the country of origin of any funds transmitted to Vixotrade; and
3. the destination country of any funds refunded by or withdrawn from the Company.

Vixotrade does not wish to enter into a business relationship if the funds are sourced from criminal activities or if the nature of your account transactions is illegal in any manner whatsoever.

The Company reserves the right to review and/or amend its Anti Money Laundering Policy, at its sole discretion, whenever it deems fit or appropriate.

Our AML Policy is a policy only but is not part of our Terms and Conditions of Business and is not intended to be contractually binding.

For additional questions concerning Vixotrade policies, please contact our Compliance Department:

Email: [compliance@vixotrade.com](mailto:compliance@vixotrade.com)

Attn. Compliance Department, Luxon LTD, registration No.2025-00541.

Address: Fortgate Offshore Investment and Legal Services Ltd. Ground Floor, The Sotheby Building, Rodney Village, Rodney Bay, Gros-Islet, Saint Lucia

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