

## 1. Purpose

This Policy establishes a comprehensive framework for detecting, preventing, and reporting money laundering, terrorist financing, and proliferation financing activities in compliance with the applicable laws and regulatory guidance of Saint Lucia, including:

- Money Laundering (Prevention) Act, Cap. 12.17 of Saint Lucia
- Anti-Terrorism Act, Cap. 12.23 of Saint Lucia
- Financial Intelligence Authority Act
- Regulations and Guidance Notes issued by the Financial Intelligence Authority (FIA) of Saint Lucia
- Financial Action Task Force (FATF) Recommendations (latest version)

The objectives of this Policy are to:

- Protect the integrity and reputation of Morroc Prime Limited and Saint Lucia's financial system
- Ensure timely detection, monitoring, and reporting of suspicious or unusual transactions
- Prevent misuse of the Company's services for illicit or prohibited activities
- Embed a strong compliance culture across all levels of the organisation

## 2. Scope

This Policy applies to:

1. All personnel — directors, officers, employees, contractors, consultants, and agents
2. All clients — retail and institutional clients, introducing brokers, affiliates, and business partners
3. All activities — client onboarding, Forex/CFD/Indices trading, deposits, withdrawals, and internal fund transfers
4. All delivery channels — online trading platforms, electronic wallets, payment service providers (PSPs), and correspondent banking relationships

This Policy is binding on any third-party service providers performing regulated or delegated functions on behalf of the Company. Mr. Suthikiat Intusup

## 3. Governance and Oversight

3.1 Board Responsibility The Board of Directors retains ultimate responsibility for AML/CTF compliance and ensures that:

- Adequate resources are allocated to AML controls

- Policies and procedures are reviewed periodically
- Compliance risks are actively monitored and mitigated

### 3.2 AML Compliance Officer / Money Laundering Reporting Officer (MLRO)

The Board appoints a Money Laundering Reporting Officer (MLRO) with sufficient authority and independence.

The MLRO is responsible for:

- Designing, implementing, and maintaining the AML/CTF framework
- Reviewing customer risk classifications and approving Enhanced Due Diligence (EDD)
- Ensuring timely submission of Suspicious Transaction Reports (STRs) to the Financial Intelligence Authority (FIA) of Saint Lucia
- Acting as the primary liaison with regulators and law-enforcement authorities
- Providing periodic AML compliance reports to the Board

3.3 Reporting Line All employees must immediately escalate any suspicious activity or transaction to the MLRO through secure internal reporting channels. Failure to report is treated as a serious compliance breach.

## 4. Risk-Based Approach (RBA)

The Company adopts a risk-based approach in line with Saint Lucia AML legislation and FATF guidance, ensuring higher-risk customers, products, and jurisdictions are subject to enhanced scrutiny.

4.1 Customer Risk Each client is assigned a Low, Medium, or High risk rating, considering:

- Country of residence, nationality, or incorporation
- Client type (individual, corporate entity, trust, foundation)
- Source of funds and source of wealth
- Expected transaction behavior and trading profile
- Use of intermediaries, nominees, or third-party payments

High-Risk Clients Include:

- Politically Exposed Persons (PEPs), their family members, and close associates
- Clients from high-risk or sanctioned jurisdictions, including but not limited to:
  - North Korea
  - Iran
  - Myanmar

- o Russia
- o Belarus
- o Syria
- o Afghanistan
- o Yemen
- o Sudan
- o South Sudan
- o Venezuela o Cuba
- o Libya
- o Somalia
- o Iraq
- o Any country listed by FATF, UN, EU, OFAC, or UK HMT

- Clients using virtual assets, shell companies, or complex ownership structures

4.2 Product and Service Risk Products involving high leverage, cross-border settlement, or frequent withdrawals are considered higher risk and subject to enhanced monitoring and controls.

4.3 Geographic and Delivery Channel Risk Transactions conducted through:

- Non-face-to-face onboarding
- Offshore or lightly regulated payment systems
- Jurisdictions with weak AML supervision are subject to Enhanced Due Diligence and continuous monitoring.

## 5. Customer Due Diligence (CDD)

The Company performs CDD before establishing any business relationship and periodically thereafter.

### 5.1 Individual Clients

- Full legal name, date of birth, nationality, and residential address
- Valid government-issued identification or passport
- Proof of residence (utility bill or bank statement not older than 3 months)
- Declaration and verification of source of funds

### 5.2 Corporate Clients

- Certificate of Incorporation and constitutional documents

- Register of directors and shareholders
- Identification of Ultimate Beneficial Owners ( $\geq 25\%$ )
- Proof of registered and operating addresses
- Board Resolution authorising account opening
- Description of business activities and source of funds

5.3 Enhanced Due Diligence (EDD) EDD is applied when:

- The client or transaction is assessed as high risk
- The client is from a high-risk jurisdiction
- Transactions lack clear economic or lawful purpose

EDD includes:

- Senior management approval
- Verification of source of wealth and source of funds
- Increased transaction monitoring and periodic reviews

5.4 Simplified Due Diligence Simplified Due Diligence may apply only where:

- The client is a regulated financial institution in a low-risk jurisdiction
- Risk assessment supports reduced measures
- Approval is granted by the MLRO

## 6. Record Keeping

All AML records are retained for a minimum of five (5) years after termination of the business relationship or completion of a transaction, in accordance with Saint Lucia law. Records must:

- Be readily retrievable for audits or regulatory requests
- Include KYC documentation, transaction records, correspondence, and STR logs
- Be securely stored with restricted and encrypted access

## 7. Ongoing Monitoring

The Company conducts ongoing monitoring to detect:

- Unusual or inconsistent transaction patterns
- Rapid movement or layering of funds

- Third-party deposits or withdrawals without justification Automated alerts are reviewed by the MLRO and escalated where necessary.

## **8. Reporting Obligations**

8.1 Suspicious Transaction Reports (STRs) Suspicious activities must be escalated to the MLRO, who assesses and submits STRs to the Financial Intelligence Authority of Saint Lucia within the required timeframe.

### 8.2 Reporting Procedure

1. Identify and document suspicious activity
2. Internal escalation to MLRO
3. MLRO analysis and decision
4. Submission to FIA
5. Secure record retention Tipping-off is strictly prohibited.

## **9. Employee Training**

All relevant personnel receive AML/CTF training at least annually, covering:

- AML obligations under Saint Lucia law
- Identification of red flags • Reporting and escalation procedures
- Forex and CFD-specific AML risks

Training records are maintained for inspection.

## **10. Independent**

Review and Audit An independent AML review is conducted periodically to:

- Assess effectiveness of AML controls
- Verify compliance with CDD and record-keeping
- Recommend corrective actions Findings are documented and reported to the Board.

## **11. Data Protection and Confidentiality**

Client data is:

- Used solely for lawful and regulatory purposes
- Accessible only to authorised personnel
- Disclosed only to competent authorities when required All AML investigations remain confidential.

## **12. Sanctions Screening**

The Company screens clients and transactions against:

- UN Security Council Sanctions List
- OFAC SDN List
- EU Sanctions List
- UK HM Treasury Sanctions List

Confirmed matches result in immediate account restriction and reporting to the FIA.

## **13. Non-Compliance and Disciplinary Measures**

Breaches of this Policy may result in:

- Disciplinary action
- Regulatory reporting
- Civil or criminal liability under Saint Lucia law

## **14. Review and Continuous Improvement**

This Policy is reviewed annually or upon regulatory change.

The Company commits to continuous enhancement of AML controls in line with international best practices.