

ANTI-MONEY LAUNDERING (“AML”) AND KNOW YOUR CUSTOMER (“KYC”) POLICY STATEMENT
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1. PURPOSE AND SCOPE

- 1.1 This Anti-Money Laundering (“AML”) and Know Your Customer (“KYC”) Policy Statement sets out the measures, controls, and procedures adopted by **VALOR MARKETS (PTY) LTD**, a licensed South African Financial Services Provider (FSP No. **54447**), to prevent money laundering, terrorist financing, and other illicit financial activity.
- 1.2 This Policy applies exclusively to the intermediary services rendered by VALOR MARKETS (PTY) LTD under the Financial Intelligence Centre Act, 38 of 2001 (“FICA”) and related regulations.
- 1.3 IMPORTANT CLARIFICATION:
- i. **VALOR MARKETS LTD** (Union of the Comoros, Registration No. **HY01223079** and license number **BFX2024002**) is the contracting broker where clients are onboarded, accounts are opened, and trading is executed.
 - ii. **VALOR MARKETS (PTY) LTD** does not hold client funds or execute trades. Its role is limited to intermediary and advisory services as permitted under South African law.
- 1.4 AML/KYC duties under FICA relate to activities of the South African entity. Clients acknowledge that VALOR MARKETS LTD maintains its own AML/CFT programme under the laws of the Union of the Comoros.

2. REGULATORY FRAMEWORK

- 2.1 VALOR MARKETS (PTY) LTD complies with:
- i. FICA, 38 of 2001 (as amended);
 - ii. Prevention of Organised Crime Act, 121 of 1998 (“POCA”);

- iii. Protection of Constitutional Democracy against Terrorist and Related Activities Act, 33 of 2004 (“*POCDATARA*”);
- iv. FSCA requirements under the Financial Advisory and Intermediary Services Act (“*FAIS*”).

2.2 Where intermediary services link South African clients to VALOR MARKETS LTD, VALOR MARKETS (PTY) LTD ensures compliance with FICA obligations in respect of client identification, verification, monitoring, and reporting.

3. ROLES AND RESPONSIBILITIES

3.1 The Board of Directors of VALOR MARKETS (PTY) LTD approves this AML/KYC Policy and allocates resources for its implementation.

3.2 The Compliance Officer is responsible for:

- i. Maintaining and updating the AML/KYC programme.
- ii. Filing Suspicious Transaction Reports (“*STRs*”), Cash Threshold Reports (“*CTRs*”), and Terrorist Property Reports (“*TPRs*”) with the FIC.
- iii. Liaising with the FIC, FSCA, and other regulators.
- iv. Employees must complete mandatory AML/KYC training and escalate suspicions promptly.

3.3 VALOR MARKETS LTD is responsible for the client onboarding and subsequent AML/KYC verification of the client. VALOR MARKETS LTD ensures compliance with the applicable regulatory requirements relating to the AML and KYC obligations of VALOR MARKETS (PTY) LTD.

4. CUSTOMER DUE DILIGENCE (“CDD”)

4.1 Information collected: full name, date of birth, nationality, residential address, and contact details.

4.2 Clients are screened against:

- i. International sanctions lists;
- ii. Politically Exposed Person (“*PEP*”) registers;
- iii. Adverse media databases;
- iv. Intermediary services may only be provided once due diligence is satisfied.

5. REPORTING OBLIGATIONS

VALOR MARKETS (PTY) LTD files:

- i. Suspicious Transaction Reports (“*STRs*”): within twenty-four (24) hours;
- ii. Cash Threshold Reports (“*CTRs*”): for cash transactions above twenty-five thousand Rand (ZAR 25,000) within fifteen (15) business days;
- iii. Terrorist Property Reports (“*TPRs*”): within twenty-four (24) hours where terrorist-linked property is identified.

6. RECORD KEEPING

- 6.1 Records of identification, transactions, screening results, and reports retained for at least five (5) years.
- 6.2 Records are stored securely with restricted access.
- 6.3 Backups and tamper-evident systems maintained.

7. DATA PROTECTION AND CONFIDENTIALITY

- 7.1 All client information processed in accordance with the Protection of Personal Information Act (“*POPIA*”).
- 7.2 All client data has restricted access to only be accessible to authorised staff.
- 7.3 Reports to the FIC and internal investigations are treated as strictly confidential.

8. POLICY REVIEW

This Policy is reviewed annually or sooner if legislation, risk profile, or organisational structure changes.

9. CONTACT INFORMATION

If you have any questions about our AML/KYC procedures or wish to request a copy of our full AML/CFT Programme, please contact our support team at support@valormarkets.com
