ORBI TRADE

# ORBI TRADE

## AML/KYC POLICY ORBI TRADE

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# AML/KYC External Policy

## INTRODUCTION

This External Anti-Money Laundering (AML) & Know Your Customer (KYC) Policy ("**AML/KYC Policy**") of ORBI TRADE INTERNATIONAL LTD, a company registered under registration number 8433020-1 at the address: IMAD Complex, Office 4, Ile Du Port, Mahe, Seychelles (hereinafter referred to only as the "**ORBI TRADE**" or "**The Company**") is established to prevent and mitigate potential risks of The Company being involved in illegal or illicit activities and to enable to meet its legal and regulatory obligations in this area (if any, where applicable).

All terms and definitions used in this AML/KYC Policy that were not defined here specifically must be interpreted in the meaning specified in the general Terms of Service regulating use of the Platform (General Rules), and (or) other documents provided on the Platform. If the documents mentioned above also do not define this term, the interpretation of this term is made following the applicable law or the generally accepted meaning.

Any reference to "**you**", "**your**", etc., is interpreted as a reference to the Client of our Services.

### 1. Purposes dan Basis

1.1. The Company is committed to providing the Client a lawful and secure environment. We believe that money laundering and terrorist financing are harmful to the Digital Assets ecosystem and to the legitimate interests of Client. We believe that money laundering and terrorist financing are harmful to the Digital Assets ecosystem and to the legitimate interests of the Client. We also know these activities can pose legal and operational risks to Digital Assets activities.

1.2. The Company has a global reach and serves the Client in many countries. As a result, we may receive inquiries or requests for information from law enforcement authorities outside of our jurisdiction. We are committed to complying with all applicable laws and regulations, including anti-money laundering and terrorist financing.

1.3. We have robust anti-money laundering and terrorist financing (AML/CFT) policies and practices designed to prevent these activities from happening through our services. We take a proactive approach to AML/CFT and are constantly working to improve our systems and procedures.

1.4. The Company comply with requirements set out in the following acts, rules, regulations, and good practice guidelines (Regulating Acts):

- Seychelles Republic AML - CFT Act, 2020
- Seychelles Republic AML - CFT (Amendment) Act, 2021
- Seychelles Republic AML - CFT (Second Amendment) Act, 2021
- Seychelles Republic AML - CFT Regulations, 2020
- Seychelles Republic AML - CFT (Amendment) Regulations, 2020
- Seychelles Republic AML - CFT (Second Amendment) Regulations, 2020
- Seychelles Republic AML - CFT (Amendment) Regulations, 2022
- Seychelles Republic AML - CFT (National Risk Assessment) Regulations, 2022
- Seychelles Republic AML - CFT (Countermeasures) Regulations, 2022
- Seychelles Republic AML - CFT (Cross Border Declaration) Regulations, 2022
- other documents as may be applicable from time to time.

1.5. The Company goal is to be a trusted and reliable trading platform for ORBI TRADE'S Client. Working together can help create a safe and secure environment for the Digital Assets ecosystem.

## 2. Scope

This Policy applies to all Client who use ORBI TRADE'S Services. The Client must comply with all applicable AML/CFT laws and regulations in their country or region where they are located. The specific requirements of these laws and regulations will vary from country to country. The Client must carefully review the relevant laws and regulations to ensure they follow them.

## 3. Client Identification (KYC)

Individual Client must provide government-issued ID and proof of residence. Corporate Client must provide incorporation documents, shareholder information, and proof of office. Enhanced due diligence (EDD) applies to high-risk Client, politically exposed persons (PEPs), or complex structures. The Company reserves the right to request updated documents at any time. Accounts may be suspended or terminated if documents are incomplete, invalid, or suspicious.

## 4. Risk Assessment

4.1. Based on the information gathered via the registration and AML/KYC verification, The Client shall allow The Company to understand the Client's financial background, the origin of the assets involved into transactions, and the purpose of trading in ORBI TRADE platform, as well as to check their plausibility in terms of legitimacy, or to identify circumstances that require particular clarification.

4.2. The risk assessment shall consider the following risk categories, the probability and consequences of their realization and the probability of an increase in the risk:

- Geographical risks;
- Client-related risks;
- transaction-related risks;

4.3. Geographical risks, whose factors arise from differences in the legal environment of various countries, these factors may include situation when the Client is located in such jurisdiction:

- countries identified by credible sources, such as mutual evaluations, detailed assessment reports or published follow-up reports, as not having effective systems to counter money laundering or terrorist financing;
- countries identified by credible sources as having significant levels of corruption or other criminal activity, such as terrorism, money laundering, and the production and supply of illicit drugs;
- countries subject to sanctions, embargos or similar measures issued by, for example, the European Union or the United Nations;
- countries providing funding or support for terrorism;
- countries that have organisations operating within their territory which have been designated by the Republic of Seychelles, international organisations as terrorist organisations.

4.3.1. The usage of The Company is prohibited for the citizens of the following countries and territories:

- Democratic People's Republic of Korea;
- Islamic Republic of Iran;
- Republic of Iraq;
- Republic of the Sudan;
- The United States of America (USA);

- Republic of the Union of Myanmar.

4.3.2. The usage of The Company's services is prohibited, if a Client or a transaction are explicitly connected with the following countries or territories:

- any countries or territories under UN sanctions, and further under any embargo or similar measures;
- countries with insufficient measures for preventing money laundering and terrorism financing.
- countries, which according to reliable sources are involved in terrorism support, or countries with high corruption levels.

4.4. Transaction associated risks, whose factors result from the Client activities or the exposure of a specific product or service to potential ML risks. These factors may include:

- the transaction involves substantial funds or unexplained source of funds;
- the transaction is part of series of suspicious transactions.

4.5. By opening an account, the Client agree to cooperate with AML/KYC procedures, provide requested documents promptly, and accept that restrictions may apply if AML requirements are not satisfied.

## 5. Continuous Monitoring

5.1. The Company constantly monitors the Client and their transactions.

5.2. Ongoing monitoring of Client's transactions means:

a. Scrutinizing transactions carried out throughout to ensure that these transactions are consistent with the Company's knowledge of the Client and the risks and source of the Client's funds;
b. Keeping up-to-date documents, data, or information obtained.

5.3. The Company monitors all deposits, withdrawals, and trading activity to detect suspicious patterns such as third-party transfers, inconsistent activity, or structuring to avoid reporting. Suspicious transactions will be reviewed and may be reported to the Seychelles Financial Intelligence Unit (FIU).

## 6. International Sanctions

The Company applies applicable international sanctions and pays special attention to all its Client, their activities, and facts that indicate the possibility that a Client is the subject of international sanctions.

## 7. Policy Amendment

The Company has the right to amend this AML/KYC Policy. If the current version is amended, the date of the last update of the new Policy will take effect from its publication within the Platform unless otherwise provided for in the new AML/KYC Policy.

## 8. Contact Us

If anything is left unclear in the text of this AML/KYC Policy, we will be happy to clarify its provisions. Please get in touch with us via the Platform for any further questions about this AML/KYC Policy or by email support@orbitrade.id.