

AML Policy Overview

Onexar Ltd is committed to preventing financial crimes, including money laundering and terrorist financing. This AML Policy applies to all employees, officers, and partners of Onexar Ltd and ensures compliance with international regulations and legal obligations.

Onexar Ltd strictly prohibits money laundering and any activity that facilitates the funding of terrorism or criminal enterprises.

We have implemented risk-based monitoring procedures to detect and prevent suspicious transactions.

Onexar Ltd's AML Compliance Committee is responsible for reporting Suspicious Activity Reports (SARs) to regulatory authorities. All transactions are monitored, and any suspicious activities will be reported to legal authorities without prior notice to the client.

What is Money Laundering?

Money laundering is the process of disguising illegally obtained funds as legitimate money.

Common Money Laundering Activities:

- ✓ Acquiring, transferring, or possessing criminal funds.
- ✓ Using corporate structures to hide illegal transactions.
- ✓ Converting criminal proceeds into financial assets.
- ✓ Transferring illicit funds across borders through financial institutions.

Terrorist financing differs from money laundering, as it involves the use of both legal and illegal funds to support terrorist organizations.

The Three Stages of Money Laundering

- **Placement:** The initial introduction of illegal funds into the financial system.
 - **Layering:** Moving money through multiple transactions to obscure its origins.
 - **Integration:** Once "cleaned," funds are reintroduced as legitimate assets.
- Onexar Ltd actively prevents all three stages through strict compliance policies.

Risk-Based Approach to AML Compliance

Onexar Ltd follows a risk-based approach (RBA) to identify and monitor potential money laundering threats.

Customer Risk:

- High-risk clients undergo enhanced due diligence (EDD).
- Clients from sanctioned or high-risk jurisdictions are subject to strict verification.

Product Risk:

- All financial products are monitored to prevent misuse for money laundering.
- Complex financial transactions are flagged for additional review.

Country Risk:

- Onexar Ltd does not operate in restricted jurisdictions or conduct transactions involving sanctioned countries.
- Due diligence measures are adapted based on jurisdictional risk levels.

We actively monitor and report high-risk transactions based on these factors.

Customer Identification & Verification (KYC Policy)

Onexar Ltd enforces a strict "Know Your Customer" (KYC) program for all clients.

Required Identification Documents:

- ✓ Government-issued photo ID (passport, national ID, or driver's license).
- ✓ Proof of residence (utility bill, bank statement, or rental agreement).
- ✓ Source of funds verification for large transactions.

Failure to provide KYC documents will result in account restrictions or closure.

Suspicious Transaction Monitoring & Reporting

Red Flags for Suspicious Activity:

- ✓ Unusual trading behavior inconsistent with a client's profile.
- ✓ Rapid movement of funds across multiple accounts.
- ✓ Large transactions with no clear economic purpose.
- ✓ Clients refusing to provide required KYC documentation.

If suspicious activity is detected, Onexar Ltd will file a Suspicious Activity Report (SAR) and take necessary actions, including freezing accounts.

Freezing & Termination of Accounts

Onexar Ltd reserves the right to freeze or terminate accounts if:

The account is linked to money laundering or terrorist financing.

- ✓ The client fails to provide KYC or source of funds documentation.
- ✓ Regulatory authorities request account suspension due to suspicious activity.
- ✓ Clients will not be notified prior to account freezing if suspected of financial crimes.

Compliance with International AML Regulations

Onexar Ltd complies with global AML standards, including:

- ✓ Financial Action Task Force (FATF) guidelines
- ✓ European Union (EU) AML Directives
- ✓ United Nations (UN) Sanctions List
- ✓ International sanctions & anti-terrorism laws

Non-compliance with AML regulations may result in account termination and legal action.

Reporting Suspicious Activity

If you suspect fraudulent activity, immediately contact: AML Compliance Team: compliance@onexar.com Onexar Ltd remains committed to financial transparency and security.