

Anti-Money Laundering (AML) and Counter-Terrorist Financing (CTF) Policy

Version 1.1 – April 2025



AZUREVISTAFX (PTY) LTD is authorised as a Financial Services Provider (FSP) with FAIS License number 52830, regulated by the Financial Sector Conduct Authority (FSCA) in South Africa (hereinafter referred to as the “**Company**”). The Company owns and operates the website domain and brand of www.riverquode.com.

This Policy has been developed to inform its clients and/or prospect clients that the Company complies fully with the relevant South African laws and regulations such as the Financial Intelligence Centre Act (FICA) No. 38 of 2001, the Financial Sector Regulation Act, 2017, Directive 6 of 2020 issued by the FSCA, and other applicable AML/CTF obligations, as amended from time to time.

1. Introduction

The Company is committed to combating money laundering, terrorist financing, fraud, bribery, corruption, and all other forms of financial crime. The Company recognizes that adherence to AML/CTF legislation is not only a legal requirement but also an ethical obligation to protect the financial system's integrity. By implementing this policy, the Company aims to ensure that all internal operations, controls, and procedures are aligned with South African legislation and international best practices in financial crime prevention.

2. Purpose of the Policy

The purpose of this Policy is to establish a framework of robust internal controls, operational systems, and governance measures to prevent the Company from being used as a conduit for money laundering or terrorist financing. It aims to detect and report suspicious or unusual activity in a timely and accurate manner, ensure compliance with all applicable regulations issued by the FSCA and the Financial Intelligence Centre (FIC), and provide adequate training for employees to understand and execute their AML/CTF responsibilities effectively.

3. Customer Due Diligence (CDD) and Know Your Customer (KYC)

The Company undertakes client assessments in accordance with applicable due diligence obligations during the onboarding process and throughout the course of the business relationship. In order to better understand the nature of a potential client's profile, the Company may request certain information—such as general personal or financial details—during the registration process. These requests are assessed on a case-by-case basis, taking into consideration the type of service requested and the Company's internal compliance requirements.

The Company reserves the right to request additional documentation and/or information, obtaining verification from a third-party database on a sample basis, or where the Company has reasonable grounds to believe that further information is required to satisfy its legal and regulatory requirements.

By accepting the Company's Anti-Money Laundering (AML) and Counter-Terrorist Financing (CTF) Policy, the Clients confirm that they have understood and acknowledged that such enquiries may be conducted at any stage during the business relationship with the Company, and they are expected to comply with any additional requests.

It should be noted that, the Clients are responsible to ensure that they provide to the Company correct, reliable and accurate information during the account-opening application process as well as throughout the business relationship.

In the event of any amendments and/or changes to the Clients' personal information, it is the Clients' responsibility and obligation to ensure that they have notified the Company in a timely manner and in writing at the Company's dedicated contact email address: support@riverquode.com

4. Client Acceptance and Trading Account Opening Requirements

Any potential client must be over eighteen (18) years old and reside in a country where the Company is allowed to offer its services.

The Company does not offer its services to Clients residing within European Union, USA, Canada, Russia, Belarus, Iran, Iraq, North Korea, the United Kingdom or to any other jurisdiction where such distribution would be contrary to the local laws and regulations.

Upon registration, the potential clients must complete the online account opening questionnaire providing their personal information, relevant experience and financial information, as well as their identification documents.

The following identity documentation will be acceptable for the onboarding of a prospect client:

- a. Valid Passport; or
- b. Valid National Identity Card; or
- c. Valid Driving License Card.

****The document must be issued in the individual's name and all information on the document, including a photo, date of issue, date of birth, date of expiration, issuing authority, should be clearly visible.***

The following proof of residence documentation will be accepted during the onboarding of a prospective client:

- a. A utility or phone bill; or
- b. A bank statement; or
- c. Government issued documents such as tax bill or residence permit (officially stamped)

****Any proof of residence documentation should be issued within the last six (6) months, stipulate full name of the individual, date of issue and the issuing authority.***

The Company ensures that all identity and proof of residence documentation are verified through third-party compliance software, prior to their acceptance and account verification.

5. Client Funds Withdrawal Requests

The Company follows specific AML standards and principles in terms of its withdrawal procedures, to ensure avoidance of being subjected to any AML/CTF risks and therefore it requires that any withdrawal requests of client funds are sent back to their originating source. The Company may derive from this policy only where it is reasonably justifiable to believe, at its sole discretion, that such a deviation is necessary.

The Clients have the right to withdraw any or part of the funds equal to the free margin available in their trading account(s), subject to any applicable restrictions regarding its operation and any other right or limitation on such withdrawal.

The Company reserves the right to reject a withdrawal request in instances where there are reasonable grounds to believe that the said instruction is being placed to abuse the negative balance protection advantage that the Company is offering or in instances where the Company has reasonable grounds to believe that the said transaction might be subjected to any suspicious transaction's regime.

The Company further reserves the right to reject any withdrawal request where additional information and/or documentation will not be considered satisfactory to support any client transactions throughout the business relationship with its clients, including but not limited to deposits and withdrawals which may not be considered legitimate and/ or for any other reason that it does not comply with the Company's compliance and legal obligations.

In light of the above, by accepting the terms and conditions of this policy, it is understood and acknowledged that under such circumstances there may be delays with processing the withdrawal request and/or the transaction may be rejected.

The Company will take reasonable steps to keep its clients informed about the progress of any withdrawal request, specifically in relation to processing times and any required documentation that if not in place may result in delays. Further information about the processing times can be found on the Company's website in Legal Documents section, within the General Fees policy. However, please be informed that this information is provided for indicative purposes only. It should be understood that there may be instances where the Company cannot guarantee these times because of events outside of its controls.

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

6. Record-Keeping Obligations

In accordance with FICA, the Company maintains comprehensive records of all customer information, due diligence documentation, transactional history, and internal communications.

These records are retained for at least five years following the termination of the client relationship.

According to Section 68 (1) of the Law the following records must be kept:

- Copies of the evidential material of customer identity.
- Relevant evidential material and details of all business relations and transactions, including documents for recording transactions in the accounting books and
- Relevant documents of correspondence with the customers and other persons with whom they keep a business relation.

All documents and information are available rapidly and without delay to the FICA and the competent Supervisory Authorities for the purpose of discharging the duties imposed on them by the Law. The FICA needs to be able to compile a satisfactory audit trail. Document retention may be in original documents or certified true copies and be kept in hard copy, or other format such as electronic form given that they can be available at any time and without delay.

All records are stored securely and are readily accessible for review by the FSCA or the FIC, as required.

The integrity and confidentiality of client data are maintained in accordance with data protection legislations of POPIA and PAIA.

7. Reporting of Suspicious Transactions to the FICA

The Company, in cases where there is an attempt of executing transactions which knows or suspects that are related to money laundering, terrorist- and proliferation financing, reports, through the AMLCO its suspicion to the FICA.

The definition of a suspicious transaction as well as the types of suspicious transactions which may be used for money laundering, terrorist- and proliferation financing are almost unlimited.

A suspicious transaction will often be one which is inconsistent with a client's known, legitimate business or personal activities or with the normal business of the specific account, or in general with the economic profile that the Company has created for the client.

The Company ensures that it maintains adequate information and knows enough about its clients' activities to recognize on time that a transaction or a series of transactions is unusual or suspicious.

Submission of Information to the FICA

The AMLCO will submit a Suspicious or Unusual Transaction Report to the FIC as soon as possible but not later than fifteen days after the employee became aware of a fact concerning a transaction on the basis of which knowledge or a suspicion concerning the transaction must be reported.

In terms of regulation 22 of the MLTFC Regulations a report in terms of section 29 of FICA must be filed with the FIC electronically by making use of the FIC's internet-based reporting portal at <http://www.fic.gov.za> and selecting the Registration and Reporting link.

Suspicious Transaction Register



Suspicious transactions must be reported (in writing) to the Company's AMLCO before the end of business that day.

The AMLCO is required to submit the report to the FICA within 15 days of becoming aware of the transaction.

Prior to submitting a Suspicious & Unusual Transaction Report, a record of the submitted report must be captured in the Suspicious Transaction Report Register.

File the necessary proof of submittal to the Financial Intelligence Centre, along with the Suspicious Transaction Report Register.

8. Review and Amendments

This Policy is reviewed annually or as required by regulatory developments and operational changes.

By accepting the terms and conditions of this policy, the clients confirm that it is their responsibility to remain up to date with any changes the Company makes to its Legal Documentation in general and to this policy. The applicable version at any time shall be the latest version available on the Company's website.

In the event of a dispute, the latest version available at the time of the dispute shall prevail.



AZUREVISTAFX (PTY) LTD

AZUREVISTAFX (PTY) LTD under the brand riverquode.com is a South Africa Investment Firm, authorized and regulated by the Financial Sector Conduct Authority (FSCA) of South Africa, with FSP License Number 52830. AZUREVISTAFX (PTY) LTD registration number is 2020/750823/07.

Registered Address: 2ND FLOOR NORWICH PLACE, NORWICH CLOSE, SANDOWN SANDTON, GAUTENG, 2031

Website: www.riverquode.com

support@riverquode.com