

December 2025



**ZX Capital Markets Ltd**

# **AML Policy**

ZX Capital Markets Ltd (Saint Lucia)  
Registered in Saint Lucia under company number 2023-00378  
Ground Floor, The Sotheby Building, Rodney Village, Rodney Bay, Gros-Islet, Saint Lucia.

## Table of Contents

1. Introduction .....	3
2. Account Opening Procedures - Know Your Customer Policy (KYC) .....	3
3. Customer Due Diligence .....	4
4. Photo ID .....	4
5. Proof of Residence .....	4
6. Bank Account Requirements .....	4
7. Customers Screening.....	5
8. Ongoing Monitoring of Customers and Reporting .....	5
9. Reporting.....	5
10. Record Retention.....	5
11. Training .....	5
12. AML Compliance Vigilance.....	5
13. Funds Withdrawal Procedure .....	6
14. Compliance Footnote.....	7

This risk disclosure is intended to inform you of the risks that exist in trading activities on financial markets. You must recognize that these risks entail a chance of losing money while trading. This disclosure is informational and must not be considered a list of all possible risks.

ZX Capital Markets LTD (“the Company”) collects and verifies the personal identification information of all account holders, and then subsequently logs and tracks the transactions that are carried out by its clients. In order to open an account with The Company, a valid form of government-issued identification (Passport, State ID, or Driver's License), a proof of residence, and bank account information is required, along with a completed account application.

## 1. Introduction

It should be noted that the Company tracks any suspicious transactions made by clients and any transactions executed under non-standard trading conditions.

- The Company carries out its activities in line with the anti-money laundering framework as laid out by the Financial Action Task Force.
- All the Company client funds are held in separate, segregated accounts that are designated solely for client deposits and withdrawals.
- The Company monitors funding from bank accounts held outside the account holder's home country.
- The Company does not accept deposits from third-parties nor cash deposits or disbursements under any circumstances.
- The Company matches each deposit to the account name held on file for that customer.
- The Company reserves the right to refuse to process a transaction where it believes the transaction to be connected in any way to money laundering or criminal activity. In accordance with international law, The Company is under no obligation to inform the client when suspicious activity is reported to any corresponding regulatory or legal bodies.

## 2. Account Opening Procedures - Know Your Customer Policy (KYC)

As part of the account opening procedure, prospective customers must provide proof of identity and address, source of funds and investment objectives to the Company.

The “Financial Action Task Force” (FATF) sets AML policies for countries to follow. The Company is required to do an “Enhanced Due Diligence” on clients from the others as they are classed as High Risk by the FATF, thus, we cannot accept clients from *The United States, North Korea, Iran, Myanmar, Cuba, Sudan and Syria*.

This risk disclosure is intended to inform you of the risks that exist in trading activities on financial markets. You must recognize that these risks entail a chance of losing money while trading. This disclosure is informational and must not be considered a list of all possible risks.

### 3. Customer Due Diligence

Customer Due Diligence incorporates “Know your customer” or “KYC” procedures for the identification and verification of the identity of our customers, including, where applicable, their respective beneficial owners.

The Company is committed to the prevention of money laundering activities through our services and as such comply with regulatory requirements such as:

- Identification and execution of enhanced due diligence measures for monitoring high-risk clients, including Politically Exposed Persons (PEPs), their relatives and close associates
- Senior management review and approval of high-risk customers, including Politically Exposed Persons

### 4. Photo ID

The following are acceptable forms of photo identification:

- A valid passport
- A valid National Identity Card
- A valid government ID, such as a Driver's License or State ID

*(Please note that all photo IDs are verified through third-party compliance software.)*

### 5. Proof of Residence

The following are acceptable forms of proof of residence:

- A utility or phone bill
- A bank statement

*(Please note that proof of residence must be current i.e. not older than 90 days)*

### 6. Bank Account Requirements

The Company account holders must have a valid bank or credit card account in their name. The bank/credit card statement must show their name and the same registered address as that shown on their application.

This risk disclosure is intended to inform you of the risks that exist in trading activities on financial markets. You must recognize that these risks entail a chance of losing money while trading. This disclosure is informational and must not be considered a list of all possible risks.

## **7. Customers Screening**

The adoption of policies and procedures to ensure compliance with the applicable restrictive measures (i.e. EU/UN/OFAC sanctions) and that the Company does not engage in any activity for, on behalf of, for the benefit of, any individual, entity or organization subject to sanctions or maintain a relationship with a person against whom enforcement measures are affected. In this respect, ongoing customer screening is performed against a global collection of sanctions, Politically Exposed Persons, Adverse Media and Enforcement Data.

## **8. Ongoing Monitoring of Customers and Reporting**

The establishment of systems and processes to monitor account activity and customer transactions.

## **9. Reporting**

Creation, tracking and filing of Suspicious Activity Reports (SARs) and Suspicious Transaction Reports (STRs) to the appropriate regulatory authority where required.

## **10. Record Retention**

The retention of customer and transaction records for a period of five (5) years after the termination of business relationship with customers, or transaction execution date.

## **11. Training**

The provision of adequate and frequent AML/CFT training for Company employees, relevant to the role they undertake, for the purpose of prevention of money laundering and terrorist financing.

## **12. AML Compliance Vigilance**

The Company is fully committed to remaining vigilant to prevent the use of its products and services by those who seek to abuse them. It continually seeks to combat money laundering and terrorist financing through the prevention, detection and reporting of unusual or suspicious behavior.

This risk disclosure is intended to inform you of the risks that exist in trading activities on financial markets. You must recognize that these risks entail a chance of losing money while trading. This disclosure is informational and must not be considered a list of all possible risks.

In addition, the Company constantly assesses the effectiveness of its existing policies, procedures and technologies and updates them as needed to address the changing environment. The Company also established an employee training program to ensure that the staff is well-informed about the evolving techniques used by criminals to penetrate the system and employees are well-equipped to combat money laundering and other financial crimes.

The fight against money laundering is a never-ending and ever-changing process. At the Company, we recognize that preventing money laundering and identifying potential terrorist financing activities involves constant vigilance and the ability to keep up with criminals' sophisticated schemes. We acknowledge that we must constantly work to identify and understand the potential risks of money laundering and terrorist financing and implement appropriate processes to mitigate and eliminate such risks.

### **13. Funds Withdrawal Procedure**

The withdrawal procedure at the Company detailed below follows the strict principle that ensures funds are securely remitted back to their originating source.

- The Company customers must complete a signed paper or digital withdrawal request containing inter alia, their correct account information.
- The withdrawal form must be submitted to the Company Finance department for processing. The Finance department will confirm the account balance, verify that there are no holds or withdrawal restrictions on the account, and then approve the withdrawal request, pending compliance approval.
- The Company Compliance department reviews all withdrawal requests approved by the Finance department, verifying that the original funds are being withdrawn through the same method of deposit and to the name of the account holder on file.
- The Compliance department will also examine the withdrawal request against the customer's deposit history to ensure there is no suspicious activity, and if none verifies the bank account details held on file.
- Withdrawal requests approved by the Company Compliance department are sent back to the Finance department, and the funds are released to the client.
- In the event that a withdrawal is flagged for suspicious activity, the withdrawal is placed on hold, pending further investigation by the Company management.
- The Company Management will decide if further action is needed and which, if any, relevant regulatory bodies need to be contacted.

This risk disclosure is intended to inform you of the risks that exist in trading activities on financial markets. You must recognize that these risks entail a chance of losing money while trading. This disclosure is informational and must not be considered a list of all possible risks.

## 14. Compliance Footnote

The compliance procedure related to AML listed above is only a brief summary of the compliance function guidelines followed by the Company compliance team. A detailed copy of our compliance policy is available for qualified institutions, regulatory bodies, and related counterparties. For additional questions concerning the Company policies, please contact our Compliance department. No substitutions or modifications will be accepted to the requirements above. The Company Compliance department reserves the final determination regarding the validity of these documents.

Clients should assume that all information provided to the Company is available to the competent regulatory authorities in (a) the country of incorporation of the Company, i.e. St. Saint Lucia; (b) the country of origin of any funds transmitted to the Company; and (c) the destination country of any funds refunded by or withdrawn from the Company.

The Company does not want your business if your funds are sourced from criminal activities or if the nature of your account transactions is illegal in any manner whatsoever.

The Company reserves the right to review and/or amend its Money Laundering Prevention Policy, at its sole discretion, whenever it deems fit or appropriate. Our AML Policy is a policy only; it is not part of our Terms and Conditions of Business and is not intended to be contractually binding.

This risk disclosure is intended to inform you of the risks that exist in trading activities on financial markets. You must recognize that these risks entail a chance of losing money while trading. This disclosure is informational and must not be considered a list of all possible risks.