



ANTI-MONEY LAUNDERING (AML) POLICY RAKIZ CAPITAL LTD

Effective Date: May 2, 2025

1. POLICY STATEMENT

Rakiz Capital LTD is committed to preventing money laundering and terrorist financing through its business operations. This policy establishes standards to comply with applicable AML laws and regulations, including the Registration of Supervised Entities Act No. 12 of 2023 and other relevant Saint Lucia AML/CFT regulations.

1.1 Regulatory Framework

Rakiz Capital LTD acknowledges Saint Lucia's commitment to combating money laundering and terrorist financing as evidenced by:

- Registration of Supervised Entities Act No. 12 of 2023, which mandates the registration of specified persons engaged in other business activities with the Financial Intelligence Authority (FIA)
- Active participation in the Caribbean Financial Action Task Force (CFATF)
- Adherence to the Financial Action Task Force (FATF) recommendations

The company commits to following FIA guidance and utilizing available resources to ensure full compliance with Saint Lucia's AML/CFT framework.

2. AML COMPLIANCE OFFICER

Mr. Shanavas Bengalath is appointed as the AML Compliance Officer responsible for implementing and overseeing the company's AML program, ensuring regulatory compliance, and filing suspicious activity reports when necessary.

3. CUSTOMER DUE DILIGENCE (CDD)

Rakiz Capital LTD will:

- Verify customer identity using reliable documentation
- Identify beneficial owners for legal entities (25% or greater ownership)
- Understand the nature and purpose of business relationships
- Maintain records of all CDD information
- Conduct ongoing monitoring of customer relationships

4. ENHANCED DUE DILIGENCE (EDD)

Enhanced measures will be applied to higher-risk customers, including:

- Politically Exposed Persons (PEPs)
- Customers from high-risk jurisdictions
- Complex or unusual transactions
- Transactions with no apparent economic or lawful purpose

5. TRANSACTION MONITORING

Rakiz Capital LTD will:

- Monitor customer transactions for suspicious activity
- Review transactions against customer profiles and risk assessments
- Maintain systems to detect unusual patterns or activities

6. SUSPICIOUS ACTIVITY REPORTING

Suspicious activities will be promptly reported to the AML Compliance Officer, who will determine whether to file a Suspicious Activity Report (SAR) with the appropriate authorities.

7. RECORD KEEPING

All customer identification, transaction records, and internal reports will be maintained for a minimum of five years or as required by applicable law.

8. STAFF TRAINING

All employees will receive regular AML training on:

- Relevant regulations and obligations
- Customer due diligence procedures
- Identification of suspicious activities
- Internal reporting procedures

9. POLICY REVIEW

This policy will be reviewed annually by the AML Compliance Officer and updated as necessary to reflect changes in regulations or business operations.

10. APPROVAL

Approved by the Board of Directors of Rakiz Capital LTD.


Mr. Shanavas Bengalath
AML Compliance Officer, Rakiz Capital LTD

Date: 05/05/2025