ALTARA
MARKETS
TRADE GLOBAL. GROW TOGETHER.

Altara Markets Ltd

- Ground Floor, The Sotheby Building, Rodney Village, Rodney Bay, Gros-Islet, Saint Lucia
- **Registration No.:** 2026-00505
- **Office:** +44 20 3097 1344
- **WhatsApp:** +20 104 139 3876
- **Email:** info@altaramarkets.com
- **Website:** www.altaramarkets.com

AML Policy

Altara Markets Ltd. | Saint Lucia | Version 1.0 | Effective 16 August 2026

This policy establishes Altara Markets Ltd.'s risk-based controls against money laundering, terrorist financing, sanctions evasion, fraud and misuse of client accounts.

COMPANY	Altara Markets Ltd.
REGISTERED / OPERATING LOCATION	Rodney Bay, Saint Lucia
WEBSITE	altaramarkets.com

IMPORTANT This document forms part of the contractual and/or policy framework applicable to clients and users of Altara Markets Ltd. services, subject to applicable law.

1. Policy Objective

The Company maintains a risk-based compliance framework designed to identify clients, understand the purpose and expected nature of relationships, assess financial-crime risk, monitor activity and respond to suspicious or prohibited conduct. Controls are calibrated to the Company's products, clients, delivery channels, geographies and payment methods.

2. Customer Due Diligence (CDD)

- Obtain and verify identity using reliable documents/data appropriate to the client type.
- Verify residential or registered address where required.
- Identify beneficial owners and persons acting on behalf of a client.
- Understand purpose, intended activity, expected funding methods and source of funds where appropriate.
- Screen clients and relevant parties against applicable sanctions, PEP and adverse-risk information.

3. Enhanced Due Diligence (EDD)

Enhanced measures may be applied to higher-risk relationships, including PEP exposure, unusual ownership, high-risk geographies, complex funding patterns, significant virtual-asset activity, adverse information, unusual transaction size or behavior inconsistent with the stated profile. EDD may include source-of-wealth evidence, additional source-of-funds evidence, senior approval and increased monitoring.

4. Source of Funds / Source of Wealth

The Company may request bank statements, payslips, business records, sale agreements, investment statements, tax records, wallet transaction evidence, exchange statements or other reasonable evidence. Refusal or inability to provide adequate evidence may result in restriction, rejection or termination.

5. Deposits and Third-Party Payments

The Company generally expects funding to originate from an account, card or wallet attributable to the Client. Undisclosed third-party deposits, cash-equivalent arrangements, rapid pass-through activity, circular transfers and unexplained payment patterns may be rejected or investigated.

6. Virtual Assets

Where crypto funding is supported, the Company may apply wallet screening, transaction tracing, source-of-crypto checks, network confirmation requirements and additional evidence. The Company may decline assets, networks, wallets or transactions presenting unacceptable sanctions, fraud, darknet, mixer/tumbler, theft or other financial-crime

risk.

7. Transaction Monitoring

The Company may monitor deposits, withdrawals, trading activity and account behavior for anomalies, including rapid in/out movement without plausible trading purpose, structuring, multiple unrelated funders, inconsistent geography, unusual device access, unexplained wealth, payment reversals or activity inconsistent with the Client profile.

8. Suspicious Activity and Reporting

Where the Company identifies circumstances that trigger a legal reporting obligation, it may make a report to the competent authority without notifying the Client where disclosure is prohibited. The Company will preserve confidentiality of such processes to the extent required by law.

9. Sanctions

The Company does not knowingly provide services in breach of applicable sanctions. Accounts, transactions or counterparties may be rejected, frozen, restricted or reported where required by applicable law or binding sanctions obligations.

10. Record Keeping

KYC records, transaction information, risk assessments, communications and compliance decisions will be retained for the period required by applicable law and legitimate compliance needs, with access restricted according to role and security requirements.

11. Training and Governance

Relevant personnel should receive periodic AML/CFT and sanctions training. Compliance responsibilities, escalation channels, risk assessments and control effectiveness should be reviewed periodically and when material products, geographies or payment channels change.

12. Client Cooperation

Clients must promptly provide accurate information and supporting evidence. Providing false documents, concealing beneficial ownership or attempting to bypass controls is a material breach and may lead to account closure and other lawful action.

Legal review note: This document is designed as an operational legal draft for CRM deployment. It should be reviewed by qualified counsel for Altara Markets Ltd. before final public/client use, particularly for cross-border solicitation, licensing, consumer protection, privacy, tax and dispute-resolution requirements.

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DOCUMENT APPROVAL / ELECTRONIC SIGNATURE

AUTHORIZED SIGNATORY	
DATE	17-08-2026

AUTHORIZED SIGNATURE / COMPANY SEAL

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ALTARA MARKETS LTD
SAINT LUCIA