AML POLICY

Anti-Money Laundering Policy

Introduction

1. ROXFIN belongs to Quilter Investors Limited and share several investment brands including ROXFIN.COM

2. This Agreement covers all relationships between the Company and its clients who have registered on ROXFIN.COM. The Company provides its services only to persons who are of legal age.

3. The Company has the right to change or amend the Agreement at its sole discretion from time to time. All changes will be effective immediately, once updated and published on the website. If the Client continues to use the services of the Company after this term, then by default this means the Client has given consent to the changes that have been made. For the avoidance of doubt, it is advised that the Client regularly checks this Agreement for any changes and monitors news on ROXFIN.COM

AML Implemented Procedures

ROXFIN implements a strict anti-money laundering policy which enables us to identify suspected clients and ensure we maintain high standards in order to minimize procedural complications for those clients who are legitimate. We have developed an advanced electronic system to help us in fulfilling our commitment to assist governments in combating illegal financial transactions, which verifies client identification completely and maintains detailed records of all previous financial transactions.

In an effort to counter money laundering and other illegal activity, we have decided not to support any cash transactions, regardless of their stated purpose. Our firm has the right to cancel or deny a transaction at any point if there are suspicions regarding its legality. As stated in accordance with international law, the firm is under no obligation to notify the customer that it has contacted the appropriate legal authorities regarding a dubious transaction.

Policy of Compliance

We have created a policy of compliance for the purpose of meeting all lawful criteria regarding money-laundering.

This system encompasses the appointment of a compliance officer, the creation of policies and frequent review of their implementation and effects, and professional compliance training to staff members. In addition, ROXFIN.COM regularly updates its electronic systems to satisfy the most modern regulations as developed for the most advanced and sophisticated checks to trace money laundering/financial crime. Another key part of ROXFIN.COM policy is the professional training of staff members in using our modern technological systems to trace illegal activities.

Additional Disclosure Identification

To ensure that the company complies fully with anti-money laundering legislation, ROXFIN.COM requires two types of identification documents to verify a client's account. The first document is a government issued document which includes a photo of the customer; this can be a passport, ID card or driving license. The second document is a bill orany other such document which bears the complete name and address of the client; this canbe a utility bill, bank statement, affidavit or any other document which states the client's full name and address. The latter type of document must be no older than 3 months.

Further Information Regarding Depositing and Withdrawing

With money deposits, the name of the sender of funds must match the name of the client we have in our records for that account. Third parties are not allowed to deposit on behalf of clients.

Likewise, when a withdrawal is made, the recipient's name should be identical to that of the account holder. Additionally, the names of the sender and recipient should match. In cases of withdrawals being executed using an online payment method, it should be made to an account with matching credentials exclusively.