

# AML/CTF POLICY

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Issued by TRUO MARKETS LIMITED

Company Number: 227367 GBC

Licence Number: GB25204877

Authorised and regulated by the Financial Services Commission, Mauritius

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## 1. Introduction

Truo Markets Limited ("TRUO", "we", "us" or "our") is committed to maintaining high standards of Anti-Money Laundering (AML) and Counter-Terrorist Financing (CTF) compliance. We require our management, employees, representatives and relevant service providers to observe applicable AML/CTF standards, internal controls and procedures.

This AML/CTF Policy sets out our general approach to preventing the use of our services for money laundering, terrorist financing, sanctions evasion, fraud or other criminal activity. It applies to our client onboarding, account maintenance, transaction monitoring, record keeping and reporting processes.

## 2. Money laundering and terrorist financing

Money laundering is the process of making funds or assets generated by criminal activity appear to have originated from a legitimate source. Terrorist financing involves the provision, collection or movement of funds or assets for terrorist purposes, whether the funds are derived from legal or illegal sources.

The process of money laundering is commonly described in three stages:

### 2.1 Placement

Placement occurs when illicit funds enter the financial system, including through bank deposits, transfers, payment channels or other financial instruments. A money launderer may attempt to avoid suspicion by splitting funds into multiple smaller transactions.

### 2.2 Layering

Layering occurs when funds are moved between accounts, entities, jurisdictions or financial instruments to obscure their origin, ownership or audit trail. The purpose is to make tracing the funds more difficult.

### 2.3 Integration

Integration occurs when funds are reintroduced into the economy as apparently legitimate funds and may be used to purchase goods, services, investments or other assets.

## 3. AML/CTF policy statement

TRUO is licensed to provide financial services and is committed to preventing our products, accounts, trading platform and payment channels from being used for money laundering, terrorist financing or other unlawful activity.

For this purpose, TRUO maintains policies, procedures and controls designed to identify clients, verify identity information, assess risk, monitor activity, maintain records, identify suspicious activity and report or cooperate with competent authorities where required or permitted by applicable laws.

As part of our AML/CTF controls, TRUO does not accept or pay cash under any circumstances. We reserve the right to refuse, restrict, suspend, terminate or delay any account, transaction, payment or client relationship where we consider that the activity may be illegal, suspicious, inconsistent with our internal policies, or related to money laundering, terrorist financing, sanctions evasion, fraud or other financial crime.

## 4. AML and KYC procedures

TRUO's AML and know-your-customer (KYC) procedures include, without limitation:

- client identification and verification;
- client due diligence and enhanced due diligence where required;
- beneficial ownership checks for corporate clients;
- sanctions, politically exposed person and adverse media screening where appropriate;
- source of funds and source of wealth enquiries where appropriate;
- ongoing monitoring of client activity and transactions;
- record keeping and audit trail maintenance;
- internal escalation and reporting of suspicious activity; and
- periodic review and update of client information.

## 5. Know Your Customer and due diligence

Because of our commitment to AML/CTF and KYC standards, each client is required to undergo an identity verification and due diligence process before or during the account opening process and, where appropriate, during the course of the business relationship.

Before accepting an application from a potential client, TRUO may request satisfactory evidence of identity, residential address, beneficial ownership, source of funds, source of wealth, business activity or any other information required for regulatory, risk management or operational purposes. We may apply enhanced scrutiny to clients, jurisdictions, entities, beneficial owners or transactions that present higher AML/CTF, sanctions, fraud or corruption risk.

### 5.1 Individual clients

During registration and onboarding, individual clients may be required to provide personal information and supporting documents, including without limitation:

- full legal name, date of birth, nationality, country of residence, residential address, contact details and employment information;
- a valid government-issued identity document, such as a passport, national identity card or driver's licence, showing the client's photograph and relevant identifying information;
- proof of residential address, such as a utility bill, bank statement or other acceptable document, generally issued within the preceding three months;
- information or documents relating to source of funds, source of wealth, payment method or transaction purpose; and
- any other information or document reasonably required by TRUO for compliance or risk management purposes.

### 5.2 Corporate clients

Where the applicant is a company, partnership, trust or other legal entity, TRUO may require information and documents to verify the entity, its ownership and control structure and the individuals connected with it. Such documents may include, without limitation:

- certificate of incorporation, certificate of registration or equivalent formation document;
- constitutional documents, such as memorandum and articles of association or equivalent documents;
- extract from a commercial register, company registry or equivalent official record;
- registered office address, principal place of business and business contact details;
- names, addresses and identity documents of directors, officers, authorised persons and beneficial owners;
- shareholder register, ownership structure chart or other evidence of ownership and control;
- description and nature of business, including products or services, business activities, commencement date and principal jurisdictions of operation;
- board resolutions, authorised signatory lists, powers of attorney or other evidence of authority to act for the entity; and
- source of funds, source of wealth, financial statements or other supporting documents where required.

## 6. Monitoring of client activity

In addition to collecting and verifying information from clients, TRUO conducts ongoing monitoring of client activity to identify and prevent suspicious, unusual or inconsistent transactions. A suspicious transaction may include activity that is inconsistent with a client's profile, legitimate business, known financial circumstances or usual transaction history.

Monitoring may be conducted automatically, manually or through a combination of both. TRUO may review deposits, withdrawals, trading activity, account behaviour, payment methods, account changes, geographic indicators and other risk factors. Where appropriate, TRUO may request additional information or supporting documents from a client before processing or continuing a transaction or service.

## 7. Record keeping

TRUO maintains records relating to client identification, verification documents, account information, transactions, communications, due diligence reviews, monitoring alerts and related compliance matters for as long as required or permitted under applicable laws, regulations and internal policies.

Records may be stored electronically or physically and may be made available to competent authorities, regulators, auditors, professional advisers or service providers where required or permitted by applicable laws or legitimate business purposes.

## 8. Refusal, suspension and termination

TRUO may refuse to open an account, reject an application, restrict services, suspend activity, delay or refuse a transaction, close an account or terminate a business relationship where:

- required information or documents are not provided or cannot be verified;
- the client fails to pass KYC, due diligence, sanctions, fraud or risk checks;
- the activity appears suspicious, unusual, inconsistent, unlawful or potentially linked to financial crime;
- continuing the relationship may expose TRUO to legal, regulatory, reputational, operational or financial risk; or
- TRUO is required or permitted to do so under applicable laws, regulations, contractual terms or internal policies.

## 9. Reporting and cooperation with authorities

Where required or permitted by applicable laws, TRUO may report suspicious activity, provide information, freeze or restrict activity, or otherwise cooperate with regulators, law enforcement authorities, courts, tribunals, government agencies, financial intelligence units or other competent authorities.

TRUO may be prohibited from notifying a client that a report has been made or that an investigation, review, restriction or request from an authority is taking place.

## 10. Contact details

If you have any questions about this AML/CTF Policy, you may contact us at:

<b>Entity:</b>	Truo Markets Limited
<b>Registered Office:</b>	C/o Credentia International Management Ltd, The Cyberati Lounge, Ground Floor, The Catalyst, Silicon Avenue, 40 Cybercity, 72201 Ebene, Republic of Mauritius.
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