Anti Money Laundering Policy

Revised working draft | 12 October 2026

Berocca-Ag is operated by Trading One Capital (PTY) LTD (the “Company”), a South African company registered under CIPC number 2015/310027/07 and authorised and regulated by the Financial Sector Conduct Authority (FSCA) under FSP number 47701. Registered address: Unit 9B, Bristol House, 1A Shongweni Road, Hillcrest 3650, South Africa.

1. Purpose and scope

The Company prohibits the use of its trading accounts, payment channels and services for money laundering, terrorist financing, sanctions evasion, fraud or other unlawful purposes. This policy applies to prospective and existing clients and to transactions conducted through Berocca-Ag.

The Company applies a risk-based approach to customer due diligence, transaction monitoring, recordkeeping and escalation, subject to the laws and regulatory obligations applicable to its operations.

2. What money laundering involves

Money laundering is the concealment or disguise of the unlawful origin, ownership or destination of funds. It may involve placement of funds into the financial system, layering through transactions intended to obscure their origin, and integration of the proceeds into apparently legitimate assets or accounts.

Trading accounts can be misused through deposits, offsetting trades, transfers and withdrawals that have little genuine commercial purpose. The Company therefore reviews both the source of funds and the pattern of account activity.

3. Customer identification and verification

Before an account is approved or transactions are permitted, the Company may require a valid government-issued identity document, evidence of residential address and information on the client's occupation, expected trading activity and source of funds or wealth.

Acceptable address evidence may include a recent utility bill or financial institution statement displaying the client's full name, residential address, issue date and issuing institution. Further documentation may be required where a client's risk profile or the applicable rules warrant it.

For corporate clients, the Company may verify registration documents, directors, authorised representatives and ultimate beneficial owners. Clients must provide accurate information and promptly notify the Company of material changes.

4. Payments and ownership of funds

Deposits must originate from payment instruments or accounts held in the verified client's name. The Company does not accept cash, money orders or third-party payments and may reject payments from unsupported channels.

Withdrawals will normally be returned to the original funding source, subject to technical availability, payment-provider rules and applicable anti-money-laundering requirements. Where this is impossible, the Company may require additional evidence and approve an alternative verified account in the client's own name.

5. Screening and monitoring

The Company may screen clients and beneficial owners against applicable sanctions, politically exposed person and adverse-media information, and review activity for unusual deposit, trading and withdrawal patterns.

The Company may request explanations and supporting evidence, delay processing while conducting lawful checks, reject transactions, restrict an account or terminate the relationship where justified.

6. Suspicious activity and confidentiality

Potentially suspicious activity is escalated internally and, where required, reported to the competent authorities. The Company may be legally restricted from disclosing whether a report has been made or an investigation is underway.

Records of verification and transactions are retained for the periods required by applicable law and safeguarded under the Privacy Policy.

7. Restricted jurisdictions

The Company may decline clients from jurisdictions subject to legal, sanctions, licensing or internal risk restrictions. The legacy policy contains a country list that requires separate compliance validation before publication; this draft does not present that list as a verified current prohibition.

8. Contact

Questions concerning this policy may be sent to support@berocca-ag.com.