

## **Anti-Money Laundering Policy**

### **1. CORPORATE COMMITMENT**

FewpiPs maintains a zero-tolerance stance toward money laundering, the financing of terrorism, and the circumvention of international sanctions. Our operations are governed by the strict regulatory frameworks of St. Lucia, ensuring that our virtual trading ecosystem remains a secure and transparent environment for all legitimate participants.

### **2. REGULATORY ADHERENCE**

FewpiPs operates in total alignment with the following statutory provisions of Saint Lucia:

- **Money Laundering (Prevention) Act, Cap. 12.20**
- **Virtual Asset Business Act, Cap. 12.33.**
- **Anti-Terrorism Act, Cap. 3.16.**
- **Proceeds of Crime Act, Cap. 3.04.**
- **Registration of Supervised Entities Act, Cap. 12.36.**

### **3. THE FEWPIPS RISK-BASED MODEL**

In accordance with **SI No. 53 of 2023**, FewpiPs employs a **Risk-Based Approach (RBA)**. Unlike automated platforms, we prioritise human oversight to evaluate the integrity of our counterparty relationships.

- Manual Scrutiny: Every account activation and reward disbursement undergoes a manual compliance review.
- Dynamic Assessment: We perform ongoing monitoring of trading behaviors to detect anomalies that may suggest illicit financial movement.

### **4. IDENTITY VERIFICATION PROTOCOLS (KYC)**

Our **Customer Due Diligence (CDD)** and **Enhanced Due Diligence (EDD)** procedures are designed to establish the true identity of our clients beyond a reasonable doubt.

- Core Verification: We require valid, government-issued photo identification and real-time liveness checks.

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- **Enhanced Scrutiny:** High-risk profiles or significant transaction volumes trigger EDD, which may include video interviews and deeper investigations into the source of engagement.
- **Shell Entity Prohibition:** Fewpips does not facilitate business with shell banks or anonymous financial organisations lacking a physical, regulated presence.

### **5. SURVEILLANCE & ANOMALY DETECTION**

Our Risk Management Unit is trained to identify **Red Flag** behaviors, including:

- **Structuring:** Attempting to break down transactions to evade reporting limits.
- **Third-Party Transfers:** Utilising payment methods or digital wallets that do not match the registered client's identity.
- **Sanction Evasion:** Attempting to access the platform from prohibited jurisdictions via unauthorised VPNs or obfuscation tools.

### **6. STATUTORY REPORTING & INVESTIGATIONS**

Fewpips acknowledges the investigatory authority of the **Financial Intelligence Authority (FIA)** of Saint Lucia.

- **Mandatory Disclosure:** We are legally bound to report any transactions that appear suspicious or irregular to the FIA.
- **Anti-Tipping Off:** In compliance with St. Lucian law, Fewpips will not notify any individual if their account activity is being audited or reported to regulatory authorities.

### **7. DATA STEWARDSHIP & ARCHIVING**

To support the audit trails required by the **Money Laundering (Prevention) Regulations**, Fewpips secures and archives all identification records and transaction metadata for a **minimum of five (5) years** following the closure of a client account.

### **8. ORGANIZATIONAL VIGILANCE**

- **Compliance Leadership:** Our program is managed by a Designated Compliance Officer responsible for the daily administration of AML/CTF controls.

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- **Continuing Education:** All personnel receive recurring training to stay updated on emerging financial crime trends and St. Lucian regulatory updates.
  - **Enforcement:** We operate under the understanding that violations of the Money Laundering (Prevention) Act carry severe penalties, including fines up to XCD 10 Million and significant custodial sentences.
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### **Fewpips Compliance & Risk Management**

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