VERSION 2.0

MAY 2026

Transaction Management

Group transaction monitoring and risk scoring — applicable to all RaiseFX regulated entities and their appointed Authorized Representatives.

LICENSED FSP

Raise Global SA (Pty) LTD

Reg. 2018/616118/07 · South Africa

FSCA Licence n° 50506

AUTHORIZED REPRESENTATIVE

Raise EU Services D.B LTD

Reg. HE428723 · Cyprus

Under Authorized Representative Agreement on behalf of Raise Global SA (Pty) LTD

VERSION

2.0

EFFECTIVE DATE

19 May 2026

OWNER

Kevin D. Wides · MLRO

REVIEW CYCLE

Annual, or upon regulatory change

TRANSACTION MANAGEMENT POLICY

Transaction Management

Defines the RaiseFX Group's real-time transaction monitoring framework, risk-scoring matrix, large-transaction thresholds (USD 50,000 / EUR 45,000 / GBP 40,000), and the STR escalation workflow that feeds suspicious activity reports to the Financial Intelligence Centre via goAML within 2 business days.

0 Application to the RaiseFX Group

Everything contained in this Transaction Management Policy applies in its entirety to every entity within the RaiseFX group of companies (the "Group"). Where this Policy refers to "RaiseFX", that reference is to be read as a reference to each Group entity, individually and collectively, and the obligations set out in this Policy bind each entity on the same basis.

The Group is presently composed of the following regulated entities and their Authorized Representatives:

- Raise Global SA (Pty) Ltd — Registration 2018/616118/07, Authorised Financial Services Provider FSP No. 50506, Republic of South Africa (FSCA-regulated principal).
- Raise EU Services D.B Ltd — Registration HE428723, Tax ID 10428723T, registered 8 December 2021, Vasili Tsitsani 30, Agia Fyla 3120, Limassol, Cyprus — acting as Authorized Representative for EU/EEA-facing business.

Where a provision is, by its nature, applicable only to one Group entity (for example a reference to a national law, regulator or reporting authority), that provision shall apply to that entity only. All other provisions apply to each Group entity equally. References to an "Authorized Representative" supersede any legacy references to "Payment Agent" appearing in earlier versions of this document.

1 Objective and Scope

The purpose of this Transaction Management Policy is to establish guidelines for RaiseFX to monitor and identify potentially suspicious transactions in real-time, utilising a quantitative risk-scoring system. The Policy supports the Group's prevention of money laundering, terrorist financing, market abuse and fraud, and operates as an operational annex to the Group Risk Management & Compliance Programme (RMCP).

This Policy applies to all client-facing transaction flows, including deposits, withdrawals, internal transfers and trading-account funding, across every regulated entity and every Authorized Representative within the Group.

2 Thresholds for Daily Monitoring

RaiseFX conducts daily monitoring of all transactions with a particular focus on those exceeding predefined thresholds. A "Large Transaction" is any single transaction at or above the equivalents below, irrespective of cumulative risk score, and automatically triggers compulsory review by the Money Laundering Reporting Officer (MLRO):

CURRENCY	LARGE-TRANSACTION THRESHOLD
USD	≥ 50,000
EUR	≥ 45,000
GBP	≥ 40,000

- Unusual Frequency — multiple transactions from the same client within a short timeframe that deviate from established behaviour.
- Structuring patterns — sequences of transactions just below the Large-Transaction threshold (e.g. repeated USD 49,000 / EUR 44,000 / GBP 39,000 movements).
- Cross-border flows touching FATF-listed jurisdictions (see Section 7).

⚠ **COMPULSORY MLRO REVIEW**

Any Large Transaction (USD 50,000 / EUR 45,000 / GBP 40,000 or above) must be escalated to the MLRO before settlement is released, regardless of the cumulative risk score it attracts under Section 3.

3 Risk-Scoring Matrix

Each transaction is scored across four dimensions. Points are summed to produce a cumulative score; transactions reaching the alert threshold in Section 4 are routed to the MLRO.

a. Transaction Amount (USD equivalents shown; EUR ≈ 0.90 × USD, GBP ≈ 0.80 × USD)

AMOUNT BAND (USD)	EUR EQUIVALENT	GBP EQUIVALENT	POINTS
1,000 – 10,000	900 – 9,000	800 – 8,000	5
10,000 – 25,000	9,000 – 22,500	8,000 – 20,000	10
25,000 – 50,000	22,500 – 45,000	20,000 – 40,000	15
50,000 – 100,000	45,000 – 90,000	40,000 – 80,000	25
Over 100,000	Over 90,000	Over 80,000	35

b. Frequency of Transactions (rolling 7-day window)

TRANSACTIONS PER WEEK	POINTS
Fewer than 5	5
5 – 10	10
10 – 20	15
20 – 30	20
Over 30	25

c. Geographical Anomalies

COUNTERPARTY / IP JURISDICTION	POINTS
Domestic (ZA for Raise Global SA; EU/EEA for Raise EU Services D.B Ltd)	5
Other low-risk third country	15
FATF Grey List jurisdiction	60 (mandatory EDD)
FATF Black List jurisdiction	PROHIBITED — block and report

d. Unusual Time of Transactions

TIMING	POINTS
Within client's typical business hours / historical pattern	5
Outside typical business hours or deviating from historical pattern	15

4 Real-time Monitoring and Alert Threshold

The scoring matrix is integrated into RaiseFX's real-time transaction monitoring stack. Every inbound and outbound flow is scored at the moment of capture and re-evaluated whenever new context (KYC refresh, sanctions hit, frequency drift) becomes available.

- Cumulative score ≥ 40 points: automatic alert to the Compliance team for triage within the same business day.
- Cumulative score ≥ 60 points OR any FATF Grey List nexus: mandatory Enhanced Due Diligence (EDD) and MLRO sign-off before release.

- Any FATF Black List nexus OR Large Transaction (Section 2): transaction is held pending MLRO determination.

SYSTEM INTEGRATION

Alert states, scoring rationale and reviewer decisions are written to the immutable monitoring ledger and retained for at least five years in line with FICA s.23 and EU AMLR record-keeping requirements.

5 Escalation and Suspicious Transaction Reporting

Alerts that the MLRO determines, after investigation, to involve proceeds of unlawful activity, terrorist financing or any other reportable suspicion become Suspicious Transaction Reports (STRs). The reporting pathway is as follows:

1. Compliance analyst documents the alert, scoring breakdown and supporting evidence in the case management system.
2. MLRO (Kevin D. Wides) reviews the case file, applies the legal test under FICA s.29 (Raise Global SA) or EU AMLR Article 50 (Raise EU Services D.B Ltd), and records the determination.
3. If the determination is positive, the STR is filed with the Financial Intelligence Centre via goAML at https://goweb.fic.gov.za/goAMLWeb_PRD/Home (or the MOKAS / national FIU portal for the Cyprus entity) within 2 business days of the determination.
4. The case file is cross-referenced to the corresponding entries in the Group Risk Management & Compliance Programme (RMCP) and the client's KYC dossier.

TIPPING-OFF PROHIBITION

No employee, contractor or Authorized Representative may disclose to the client or any third party that an STR has been considered, prepared or filed. Breach of the tipping-off prohibition is a criminal offence under FICA s.29(3) and Article 54 of the EU AMLR.

6 Documentation and Record-Keeping

All monitoring activities, including assigned scores, analyst notes, MLRO determinations, EDD outputs and any STRs filed, are documented and retained for a minimum of five years from the date of the transaction or the termination of the business relationship, whichever is later.

- Monitoring ledger entries are immutable and timestamped.
- STR filings, FIC acknowledgements and downstream correspondence are stored in a restricted-access vault.
- Aggregated monitoring metrics are reported to the Board Risk Committee quarterly.

7 High-Risk Jurisdictions

RaiseFX does not maintain a duplicate country list inside this Policy. The authoritative country-risk classification, including the current FATF Black List ("Call for Action") and Grey List ("Jurisdictions under Increased Monitoring"), is set out in Section 10 of the Group KYC/AML Policy and is refreshed within five business days of each FATF plenary update.

- FATF Black List nexus — transaction is PROHIBITED automatically; the flow is blocked, funds are quarantined and the matter is escalated to the MLRO for sanctions/STR assessment.
- FATF Grey List nexus — +60 risk points and mandatory Enhanced Due Diligence before release; MLRO sign-off required.
- Other elevated-risk jurisdictions identified by the Group RMCP are scored per Section 3(c).

8 Regular Review and Adjustment

The scoring system undergoes a biannual review by the MLRO, with ad hoc reviews triggered by regulatory change, FATF plenary outcomes, material incidents or false-positive / false-negative drift exceeding agreed tolerances. Adjustments are minuted, version-controlled and communicated to all monitoring personnel.

9 Training and Awareness

All employees and Authorized Representatives involved in transaction monitoring receive onboarding training and at least annual refresher training covering the scoring matrix, typologies of financial crime, sanctions screening, the STR workflow, and the tipping-off prohibition. Training completion is recorded centrally and feeds into the Group fit-and-proper assessment.

10 Document Metadata

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APPROVAL & SIGN-OFF

APPROVED BY	David BOTTIN
POSITION	Chief Executive Officer (CEO) — RaiseFX Group
SIGNATURE	
APPROVED BY	Kevin Douglas Wides
POSITION	Key Individual & FICA Compliance Officer — Raise Global SA (FSCA n° 50506)
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OWNER
Kevin D. Wides · MLRO

REGULATOR
FSCA n° 50506

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