



RAISE GLOBAL SA (Pty) Ltd

2018/616118/07

TRANSACTION MANAGEMENT POLICY

An authorised Financial Services Provider FSP No: 50506

AUGUST 2023



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 two regulated entities:

Raise Global SA (Pty) Ltd

Registration number: 2018/616118/07
Authorised Financial Services Provider, FSP No: 50506
Jurisdiction: Republic of South Africa

Raise EU Services D.B Ltd

Registration number: HE428723
Tax Identification Number: 10428723T
Date of registration: 8 December 2021
Registered office: Vasili Tsitsani, 30 Agia Fyla, 3120, Limassol, Cyprus
Jurisdiction: Republic of Cyprus / European Union

Where a particular provision of this Policy is, by its nature, applicable only to one of the Group entities (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.



Objective:

The purpose of this Transaction Management Policy is to establish guidelines for RaiseFX to monitor and identify potentially suspicious transactions in real-time, utilizing a scoring system. This aims to prevent financial crimes, including money laundering and fraud.

1. Thresholds for Daily Monitoring

RaiseFX conducts daily monitoring of all transactions with a particular focus on those exceeding predefined thresholds. These thresholds include but are not limited to:

- Large Transactions: Any transaction exceeding \$50,000
- Unusual Frequency: Multiple transactions from the same client within a short timeframe that deviate from the normal behavior.

2. Scoring System for Identifying Suspicious Transactions

RaiseFX uses a scoring system to assess transactions based on risk factors. The scoring criteria includes:

a. Transaction Amount:

The scoring system assigns points based on the transaction amount. Larger transactions receive higher scores, reflecting the increased potential risk associated with significant financial movements.

b. Frequency of Transactions:

Unusually frequent transactions within a specific time period get higher scores. The system considers the client's historical transaction frequency to identify any deviations from the norm.

c. Geographical Anomalies:

Transactions involving high-risk jurisdictions or countries with a history of financial crime receive elevated scores. The scoring system incorporates risk ratings associated with specific geographic regions.

d. Unusual Time of Transactions:

Transactions conducted outside typical business hours or during times when the client's historical transaction patterns show lower activity receive increased scores.



3. Real-time Monitoring:

RaiseFX will implement real-time monitoring systems that assign scores to transactions based on the established criteria.

Transactions surpassing a predefined score threshold will trigger an immediate alert for further investigation.

a. Implementation:

The scoring system will be integrated into RaiseFX's real-time monitoring systems. These systems will continuously assess transactions against the established scoring criteria.

b. Immediate Alerts:

Transactions surpassing a predefined score threshold will trigger immediate alerts for further investigation. This ensures that potentially suspicious activities are addressed promptly.

4. Escalation Procedures:

Identified suspicious transactions will be escalated to the designated Compliance Officer and Key Individual for further investigation.

The Compliance Officer and Key Individual will consider the cumulative score, conduct additional due diligence if necessary, and determine whether to report the transaction to relevant authorities via the Financial Intelligence Centre (FIC) portal (https://goweb.fic.gov.za/goAMLWeb_PRD/Home) as required by law.

5. Regular Review and Adjustment:

RaiseFX conducts periodic reviews of the scoring system to ensure its alignment with emerging trends, regulatory changes, and the evolving risk landscape.

Adjustments to scoring criteria are made based on the effectiveness of the system in identifying suspicious transactions.

6. Documentation and Reporting:

All monitoring activities, including assigned scores and investigation outcomes, are thoroughly documented.

Reports on suspicious transactions, along with supporting evidence and transaction scores, are maintained for regulatory compliance and potential law enforcement collaboration.



7. Training and Awareness:

Employees involved in transaction monitoring receive regular training on the scoring system, the latest trends in financial crimes, and compliance requirements.

RaiseFX maintains a culture of awareness and vigilance regarding the importance of detecting and preventing suspicious transactions.

Scoring System for Identifying Suspicious Transactions

Transaction Amount:

\$1,000 - \$10,000: 5 points
\$10,000 - \$50,000: 10 points
\$50,000 - \$100,000: 15 points
Over \$100,000: 20 points

Geographical Anomalies:

Domestic transactions: 5 points
Transactions involving high-risk jurisdictions: 25 points

Frequency of Transactions:

Less than 5 transactions per week: 5 points
5 - 10 transactions per week: 10 points
10 - 20 transactions per week: 15 points
20 - 30 transactions per week: 20 points
Over 30 transactions per week: 25 points

Unusual Time of Transactions:

Transactions during typical business hours: 5 points
Transactions outside typical business hours: 15 points

Cumulative Score Threshold for Alert:

Transactions with a cumulative score of 40 points or higher will trigger further investigation.

Escalation Procedures:

The Compliance Officer will review transactions that trigger alerts and assess the cumulative score.

Additional due diligence will be conducted for transactions with higher scores to determine the necessity of further action.

Regular Review and Adjustment:

The scoring system will undergo a biannual review to ensure its effectiveness.

Adjustments to scoring criteria will be made based on the system's ability to identify suspicious transactions and to adapt to changes in regulations and financial crime trends.



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