Payment Transparency Policy (Including Crypto Assets)

1. Purpose

This policy affirms Tradin's commitment to transparent, secure, and compliant payment practices across both fiat and crypto transactions. It aligns with:

- **Wolfsberg Group Payment Transparency Standards**
- **FATF Recommendation 16 (Wire Transfers & Virtual Assets)**
- **Mauritius Financial Services Commission (FSC) Guidelines**
- **FATF Travel Rule for Virtual Asset Service Providers (VASPs)**

Tradin aims to:

- Prevent misuse of payment systems for money laundering or terrorist financing
- Ensure traceability of both fiat and crypto transactions
- Promote trust and regulatory compliance across all payment channels

2. Scope

This policy applies to:

- **All Tradin entities and platforms**, including crypto payment services
- **Fiat and virtual asset transactions**, including stablecoins, cryptocurrencies, and tokenized assets
- **All employees and third-party service providers** involved in payment processing, compliance, onboarding, and technology

3. Key Principles

a. Complete & Accurate Payment Data

All payment messages fiat or crypto must include:

- Full originator and beneficiary information (name, wallet address, account number, physical address)
- Purpose of payment
- Transaction reference or hash
- For crypto: blockchain network used and transaction ID

This ensures traceability and supports compliance with FATF's Travel Rule for VASPs.

b. Screening & Monitoring

Tradin will:

- Screen all parties against sanctions lists (OFAC, UN, EU, FSC)
- Monitor for suspicious patterns in both fiat and crypto flows, including:
    - Use of privacy coins or mixers
    - Rapid movement across wallets or exchanges

- Structuring below reporting thresholds
- Flag and escalate transactions with incomplete or misleading data

c. Roles & Responsibilities

Role	Responsibility
Debtor Agent PSP / VASP	Ensure originator data is complete and accurate
Intermediary PSP / Node	Transmit payment data without alteration
Creditor Agent PSP / VASP	Verify beneficiary data and flag anomalies

Tradin ensures that crypto transactions are handled with the same rigor as fiat payments.

d. Technology & Standards

Tradin will adopt:

- **Structured messaging formats** (e.g. ISO 20022 for fiat, FATF Travel Rule protocols for crypto)
- **Blockchain analytics tools** to trace crypto flows and detect anomalies
- **Secure APIs** for data exchange with VASPs and regulators

Systems must support:

- Rich data fields
- Audit trails for both fiat and crypto
- Real-time alerts and reporting

e. Jurisdictional Controls

Payments involving high-risk or sanctioned jurisdictions are:

- Blocked automatically for both fiat and crypto
- Subject to enhanced due diligence if originating from or destined to flagged regions
- Reviewed quarterly against updated OFAC, FATF, and FSC lists

f. Training & Governance

All staff involved in payment operations must:

- Complete training on Wolfsberg Standards, FATF crypto guidance, and internal SOPs
- Stay updated on emerging risks in crypto payments
- Pass annual assessments on transparency and compliance

Governance includes:

- **Compliance Officer**: Oversees fiat and crypto policy implementation
- **MLRO**: Manages suspicious transaction reporting across all asset types
- **Board Oversight**: Reviews and approves policy updates annually

4. Compliance & Reporting

Reporting Mechanisms

Non-compliant transactions fiat or crypto must be reported to:

- **MLRO**
- **Mauritius FSC**
- **Other regulators** as required (e.g. FCA, FINTRAC, SEC)

Internal Audits

- Semi-annual audits cover both fiat and crypto payment transparency
- Findings are reviewed by senior management with corrective actions

Breach Handling

Violations of this policy may result in:

- Disciplinary action
- Regulatory reporting
- Legal consequences depending on severity