



Payment Transparency Policy (Including Crypto Assets)

1. Purpose

This policy affirms Tradin Global Ltd's (hereafter referred to as "Tradin") commitment to maintaining transparent, secure, and fully compliant payment practices across both fiat and virtual asset transactions. In accordance with the regulatory framework established by the Saint Lucia Virtual Asset Business Act (2022), Tradin ensures that all operations involving virtual assets are conducted under a valid license issued by the Financial Services Regulatory Authority (FSRA).

Tradin's payment protocols are designed to meet international standards and local compliance obligations, including:

- The Wolfsberg Group Payment Transparency Standards
- FATF Recommendation 16 on Wire Transfers and Virtual Assets
- FATF Travel Rule for Virtual Asset Service Providers (VASPs)
- Saint Lucia's Virtual Asset Business Act and FSRA licensing requirements

By integrating these standards, Tradin aims to mitigate financial crime risks, support effective customer due diligence, and uphold the integrity of cross-border and domestic transactions. This policy serves as a foundation for responsible financial conduct and regulatory alignment within Saint Lucia's jurisdiction.

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, FATE, 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**
- **FSRA**
- **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

