BAYOCEAN

AML & KYC Policy

Client due diligence, sanctions, transaction monitoring and escalation framework

PRE-LAUNCH FINAL DRAFT - SUBJECT TO FINAL COUNSEL AND PRODUCTION APPROVAL

Entity	Bayocean Limited
Company number	2026-00312
Registered office	Ground Floor, Rodney Court Building, Rodney Bay, Gros Islet, Saint Lucia
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Status note. This document is drafted for pre-launch approval and is not effective until formally approved and published by Bayocean. Any unresolved item is stated expressly rather than inferred.

1. Purpose and scope

Bayocean maintains a risk-based framework designed to identify clients, understand the purpose and expected activity of the relationship, screen for financial-crime risk and monitor activity over time. This policy is drafted using Saint Lucia's public AML/CFT framework as a legal/compliance basis and does not itself state that Bayocean holds a Forex/CFD regulatory licence.

2. Individual client due diligence

- full legal name, date of birth, nationality and country of residence;
- residential address and reliable address evidence or electronic verification;
- government-issued identity document and selfie/liveness or equivalent verification;
- contact details, occupation/business activity and expected account activity;
- source-of-funds information and supporting evidence where risk warrants.

3. Corporate clients and beneficial ownership

For legal entities Bayocean may obtain incorporation/registration documents, registered office, nature of business, directors/controllers, authorised persons, ownership structure and natural-person beneficial owners. Complex or unclear ownership may require enhanced evidence before approval.

4. PEP, sanctions and adverse-media screening

Clients, beneficial owners and relevant counterparties may be screened against applicable sanctions, terrorism-related lists, politically exposed person data and adverse-media sources. PEP status is not automatically a rejection, but may trigger enhanced due diligence, senior approval and stronger source-of-funds/source-of-wealth review.

5. Source of funds and source of wealth

Bayocean may ask how funds were obtained and how the client accumulated overall wealth, particularly for higher-risk clients, PEPs, large or unusual funding, complex structures or activity inconsistent with the stated profile.

6. Non-face-to-face onboarding

Remote onboarding must use identification, liveness, document-verification and monitoring controls that are reasonably effective for the risk presented. Additional checks may be required where fraud, impersonation or synthetic-identity risk is elevated.

7. USDT and blockchain controls

For USDT funding, Bayocean records the blockchain network, wallet address, TxID, amount, timestamp and relevant account information. Supported networks are TRC20 and BEP20. Bayocean may use blockchain analytics to screen sanctions exposure, stolen funds, mixers/tumblers, scams, darknet or other material risk indicators.

8. Wallet ownership and third-party funding

Bayocean generally requires funding and withdrawal wallets to be reasonably verified as controlled by the client. Third-party deposits or withdrawals are prohibited by default and may be rejected or escalated to Compliance. Wallet verification may use signed-message, micro-transfer, prior transaction, exchange-account/transaction evidence or other proportionate methods. Bayocean will never request a seed phrase, private key or recovery phrase.

9. Ongoing monitoring and enhanced due diligence

Bayocean may monitor changes in transaction size, frequency, wallet counterparties, jurisdiction, ownership, funding pattern, trading activity and client profile. Enhanced due diligence may be applied where risk is elevated.

10. Suspicious activity and internal escalation

Staff must promptly escalate potentially suspicious activity to the designated AML & Compliance Officer / MLRO. The designated function decides whether an external report is required under applicable law and must handle the matter confidentially. Staff should not disclose information that could prejudice a lawful AML investigation.

11. Governance

Bayocean will formally designate an AML & Compliance Officer / MLRO with direct escalation access to senior management and may designate an Alternate Compliance Officer / Deputy MLRO. Individual names are maintained in internal governance records and any required filings rather than published on the website unless legally required.

12. Records and retention

Bayocean retains due-diligence, screening, transaction, investigation and decision records for the periods required by applicable law and internal policy. [FINAL COUNSEL APPROVAL REQUIRED: exact statutory retention period and any FIA registration/Compliance Officer approval or notification obligation applicable to Bayocean.]

Drafting references

These public sources informed the structure of this draft. A foreign rule cited as a benchmark is not represented as directly applicable to Bayocean unless expressly stated.

Saint Lucia FIA - AML/CFT legislation: https://www.slufia.com/p/legislation

Saint Lucia FIA - forms incl. Compliance Officer Form: https://www.slufia.com/document-categories/downloadable-forms