



# PROHIBITED AND HIGH-RISK ACTIVITIES & JURISDICTIONS POLICY

Orix Wealth Ltd.

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Version: 1.0

## 1 PURPOSE AND SCOPE

Orix Wealth Ltd. is committed to upholding the highest standards of legal and regulatory compliance. This policy outlines the business categories, industries, jurisdictions, and activities that are either prohibited or restricted in connection with our services.

Orix Wealth reserves the right to decline services to any individual, entity, or jurisdiction whose activities are illegal, violate applicable regulations, or pose unacceptable financial, regulatory, reputational, or operational risk.

This policy applies to all clients, counterparties, agents, employees, and service providers associated with Orix Wealth Ltd.

## 2 PROHIBITED JURISDICTION AND SANCTIONED PERSONS

Orix Wealth Ltd. does not permit the use of its services by any individual, business, or legal entity based in, or associated with, jurisdictions subject to comprehensive international sanctions or regulatory restrictions, including but not limited to the Sanctioned Jurisdictions List mentioned in Part I or Appendix A.

The company strictly prohibits any dealings with individuals or entities that appear on sanctions lists issued by the United States Office of Foreign Assets Control (OFAC), the European Union, the United Nations Security Council, or any equivalent authority. This prohibition extends to **politically exposed persons (PEPs)** only where there is reasonable suspicion of illicit conduct, as well as persons suspected of links to terrorism, organized crime, or financial misconduct.

### **Restricted Jurisdictions:**

Clients or counterparties who are residents of or have material connections to jurisdictions listed in Appendix A, Part II (Countries/Regions with Regulatory Restrictions) are not automatically prohibited. However, such cases will be subject to enhanced due diligence (EDD), including verification of source of funds, business justification, risk assessment, and senior management approval. Business relationships in these jurisdictions may be declined if the residual risk remains unacceptable.

## 3 PROHIBITED BUSINESS ACTIVITIES

Orix Wealth Ltd. prohibits access to its services for any of the following business activities or use cases:



- Unlawful Use
- Any breach of national or international law, or engagement in fraud, deception, or concealment of source of funds
- Use of Orix services to facilitate tax evasion, regulatory filing avoidance, or sanctions violations
- Violence & Exploitation
- Promotion of hate speech, extremist content, or violence
- Harm or exploitation of minors
- Weapons, military or dual-use goods, explosives, or fireworks
- Trade in human organs, body parts, or remains
- Illicit Trade & Substances
- Narcotics, controlled substances, or psychoactive drugs
- Raw chemicals used in explosives or synthetic drug manufacturing
- Endangered species or products derived from them
- Technology Misuse
- Malware, spyware, hacking tools, DDoS software, or services promoting unauthorized access to systems
- Jammers, decryption or descrambler devices
- Surveillance tools (e.g., GPS trackers, bugging equipment) used for unlawful purpose

#### **4 PROHIBITED FINANCIAL AND INVESTMENT ACTIVITIES**

Orix Wealth Ltd. does not permit onboarding or transactions related to:

- Unlicensed or unregulated securities dealers
- Shell banks or anonymous companies with unclear beneficial ownership
- Investment schemes lacking transparency (e.g., pyramid schemes, HYIPs)
- Credit repair or debt recovery agencies operating without regulatory oversight
- Use of Orix Wealth services for escrow, fund pooling, or safekeeping purposes without prior approval
- High-risk crowdfunding or lending platforms

#### **5 RESTRICTED BUSINESS CATEGORIES (REQUIRE PRIOR APPROVAL)**

Orix Wealth Ltd. may approve business engagement with the following sectors only after enhanced due diligence, risk assessment, and management approval:

- Cryptocurrency-related businesses (wallets, exchanges, NFT platforms)
- Precious metals and stones dealers
- Oil and energy commodities (fuel, gas, petroleum products)
- Multi-level marketing schemes and commission-based sales
- Online gaming and fantasy sports
- Alcohol, tobacco, and vaping-related businesses
- Regulated gambling operators with valid licenses



- NGOs and non-profits operating in high-risk regions
- Offshore entities without a physical presence or local economic activity
- Real estate investment platforms or REITs
- Investment advisors and fund managers operating under regulatory exemptions

## **6 DISCLAIMER**

This document is representative, but not exhaustive. Orix Wealth Ltd. reserves the right to refuse or terminate a business relationship at its sole discretion where the activity presents elevated risks, even if such activity is not explicitly mentioned in this policy.

Orix Wealth Ltd. reserves the right to amend this policy at any time, without prior notice, in response to changes in laws, regulations, or its own risk management framework.

## **7 REVIEW AND MAINTENANCE**

This policy will be reviewed at least annually or in response to material regulatory changes. The Compliance Officer is responsible for the policy's upkeep and distribution.



## APPENDIX A

The below lists are illustrative and subject to change based on international sanctions or risk assessments.

### **PART I: Sanctioned Countries/Regions (Freeze on Funds and Economic Resources)**

- Afghanistan
- Belarus
- Central African Republic
- Cuba
- Darfur
- Democratic Republic of Congo
- Eritrea
- Ethiopia
- Guinea Bissau
- Haiti
- Iran
- Libya
- Mali
- Montenegro
- Myanmar
- North Korea
- North Sudan
- Serbia
- Somalia
- South Sudan
- Syria
- Tunisia
- Ukraine
- Yemen
- Zimbabwe
- Russia

### **PART II: Countries/Regions with Regulatory Restrictions**

- Australia
- Belgium
- Canada
- Japan
- US Virgin Islands
- USA
- South Africa