



# AML Policy

## **1. ANTI-MONEY LAUNDERING POLICY**

11 Money laundering involves conducting a series of financial transactions to hide the ownership, source, control, or destination of illegally obtained money. It is a process by which proceeds from criminal or terrorist activities are made to appear legitimate. The Company is dedicated to preventing money laundering through strict compliance and service procedures.

## **2. IMPLEMENTED PROCEDURES**

21 The Company is committed to enforcing a robust anti-money laundering policy to ensure that customers who raise suspicion are identified, while minimizing procedural complications for genuine and legitimate customers.

22 To support the government in combating illegal financial activities, the Company follows stringent compliance procedures to verify the identities of its clients.

23 The Company will retain original or scanned copies/photocopies of documents used to identify and verify account holders or beneficiaries, along with records of other relevant information (such as the results of name screening) collected during the due diligence process.

24 The Company maintains detailed records of all previous financial transactions associated with the client to facilitate any necessary investigations and to ensure the continuity of legitimate transactions.

25 The Company is obligated to report suspicious transactions. Misuse of the service may lead to criminal prosecution, as the Company is required to automatically report such behaviour to the authorities.

26 As a preventative measure against money laundering and related illegal activities, the Company does not accept cash transactions for deposits or withdrawals.

27 The Company reserves the right to suspend or refuse to process any transaction at any stage if it is believed to be connected to money laundering, criminal activity, or third-party funding.

28 In accordance with international law, the Company is not obligated to inform the client if their suspicious activity has been reported to the appropriate authorities.

## **3. THIRD-PARTY TRANSACTIONS**

31 The Company does not accept or engage in third-party transactions. If detected, these transactions will be returned to the beneficiary. "Third-party transactions" refer to instances where the Company receives funds from, or is asked to remit funds to, a third party other than the account holder, beneficiary, or partner for whom the Company has conducted due diligence. Examples include:

32 A beneficiary or partner requests the Company to remit funds to a third party instead of to them directly; or

33 The Company unexpectedly receives funds from a third-party payer/account instead

of directly from the account holder.

#### **4. COMPLIANCE REGIME**

4.1 The Company has established a compliance regime to fulfil its legal obligations. This includes the appointment of a compliance officer, policy development, and regular reviews of implementation.

#### **5. COMPLIANCE OFFICER (CO)**

5.1 The Company's designated compliance officer is Natalie Bianchi. The CO serves as the focal point within the Company, overseeing all activities related to the prevention and detection of money laundering and terrorist financing.

5.2 The CO provides support and guidance to Company employees to ensure that money laundering and terrorist financing risks are effectively managed.

5.3 The CO is responsible for continuously reviewing and updating the Company's anti-money laundering compliance framework (including this policy) to ensure it is effective, consistent with current statutory and regulatory requirements, and reflective of the risk profile of the Company's account holders/beneficiaries.

5.4 The CO is also responsible for regularly training employees on enhancements to anti-money laundering procedures, as required by international law.

#### **6. MONEY LAUNDERING REPORTING OFFICER (MLRO)**

6.1 The Company's CO also serves as the money laundering reporting officer (MLRO). Any employee who has knowledge or suspicion of money laundering is required to report it to the MLRO.

6.2 The MLRO plays an active role in identifying and reporting suspicious transactions. The MLRO reviews all internal reports from employees and, based on all available information, determines whether a case of money laundering exists.

#### **7. TRAINING OF EMPLOYEES**

7.1 All Company employees, especially those who interact directly with account holders/beneficiaries, must:

- a. Receive a copy of this policy and confirm in writing on an annual basis that they have read and understood it; and
- b. Be trained on anti-money laundering procedures as advised by the CO as soon as possible after beginning their employment with the Company and regularly updated on any changes.