

**PEAK INTERNATIONAL
TRADING CO. L.L.C**

COMPANY AML POLICY

ANTI-MONEY LAUNDERING POLICY

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PURPOSE

This policy has been formed in the light of FIU Regulations, Circulars & Notifications on Anti Money Laundering (AML) and Combating Financing of Terrorism (CFT).

In pursuance of the :

- Federal Decree-Law No. (20) of 2018,
- Cabinet Decision No. (10) of 2019,
- Cabinet Decision No. (58) of 2020, and related circulars & notifications by the Ministry of Economy (MOE);

The policy of the company is to prohibit and actively prevent money laundering and any activity that facilitates money laundering or terrorist financing. Money Laundering (ML) is generally understood as engaging in acts designed to conceal or disguise the true origins of criminally derived proceeds or assets so that they appear to have been derived from legitimate origins or constitute legitimate assets.

Initiatives by *PEAK INTERNATIONAL TRADING CO. L.L.C*

The basic purpose of the AML Policy is to establish a system for **PEAK INTERNATIONAL TRADING CO. L.L.C** to participate in the international efforts against ML and to duly comply with the guidelines as detailed in the various circulars & notifications of FIU, and other legal provisions and to ensure that **PEAK INTERNATIONAL TRADING CO. L.L.C** is not used as a vehicle for ML. The AML framework of **PEAK INTERNATIONAL TRADING CO. L.L.C** would meet the extant regulatory requirements.

SCOPE

This AML Policy establishes the standards of AML compliance and is applicable to all activities of **PEAK INTERNATIONAL TRADING CO. L.L.C**.

OBJECTIVES

- i. To establish a framework for adopting appropriate AML Procedures and controls in the operations / Business processes of **PEAK INTERNATIONAL TRADING CO. L.L.C**.
- ii. To put in place appropriate controls for detection and reporting of suspicious activities in accordance with applicable laws/laid down procedures.
- iii. To comply with applicable laws and regulatory guidelines.
- iv. To take necessary steps to ensure that the concerned staff is adequately trained and KYC/AML procedures are implemented.
- v. To assist law enforcement agencies in their effort to investigate and track money launderers.

COMPLIANCE OFFICER – DESIGNATION & DUTIES

The company has designated the Compliance Officer for due compliance of its AML measures. He will act as a central reference point in facilitating onward reporting of suspicious transactions and for playing an active role in the identification and assessment of potentially suspicious transactions.

The compliance officer appointed, have the appropriate competencies and experience and under his/her own responsibility, shall perform the following tasks:

- *Detect Transactions relating to any Crime.*
- *Review, scrutinise and study records, receive data concerning Suspicious Transactions, and take decisions to either notify the FIU or maintain the Transaction with the reasons for maintaining while maintaining complete confidentiality.*
- *Review the internal rules and procedures relating to combating the Crime and their consistency with the Decretal-Law and the present Decision, assess the extent to which the institution is committed to the application of these rules and procedures, propose what is needed to update and develop these rules and procedures, prepare and submit semi-annual reports on these points to senior management, and send a copy of that report to the relevant Supervisory Authority enclosed with senior management remarks and decisions.*
- *Prepare, execute and document ongoing training and development programs and plans for the institution's employees on Money Laundering and the Financing of Terrorism and Financing of Illegal Organisations, and the means to combat them.*
- *Collaborate with the Supervisory Authority and FIU, provide them with all requested data, and allow their authorised employees to view the necessary records and documents that will allow them to perform their duties.*

CUSTOMER DUE DILIGENCE

- The Company has undertaken required CDD measures to verify the identity of the **Customer** and the **Beneficial Owner** before or during the establishment of the business relationship or before executing a transaction for a Customer with whom there is no business relationship.
- And in the cases where there is a low crime risk, it will take necessary measures to complete verification of Customer identity after establishment of the business relationship, under the following conditions:

- (a) The verification will be conducted in a timely manner as of the commencement of business relationship or the implementation of the transaction.
 - (b) The delay is necessary in order not to obstruct the natural course of business.
 - (c) The implementation of appropriate and effective measures to control the risks of the Crime.
- The Company has taken requisite measures to manage the risks in regards to the circumstances where Customers are able to benefit from the business relationship prior to completion of the verification process.

MAINTENANCE OF RECORDS & THEIR RETENTION

- The Company will maintain all records, documents, data and statistics for all financial transactions and local or international commercial and cash transactions for a period of no less than **five years** from the date of completion of the transaction or termination of the business relationship with the Customer as required by the AML Law.
- The Company will keep all records and documents obtained through CDD measures, ongoing monitoring, account files and business correspondence, and copies of personal identification documents, including STRs and results of any analysis performed, for a period of no less than **five years** from the date of termination of the business relationship or after the completion of a casual transaction or from the date of completion of the inspection by the Supervisory authorities, or from the date of issuance of a final judgment of the competent judicial authorities, all depending on the circumstances.
- The records, documents and data kept shall be organised so as to permit data analysis and tracking of financial transactions.
- The Company will make all Customer information regarding CDD towards Customers, ongoing monitoring and results of their analysis, records, files, documents, correspondence and forms available immediately to the relevant authorities upon request.

MONITORING SUSPICIOUS ACTIVITY

The Company has put in place indicators that can be used to identify the suspicion on the occurrence of the Crime in order to report STRs, and will update these indicators on an ongoing basis, as required, in accordance with the development and diversity of the methods used for committing such crimes, whilst complying with what the Supervisory Authorities or FIU may issue instructions in this regard.

REPORTING TO FINANCIAL INTELLIGENCE UNIT

If the Company have reasonable grounds to suspect that a **Transaction, Attempted transaction, or Funds** constitute crime proceeds in whole or in part, or are related to the Crime or intended to be used in such activity, regardless of the amount, they shall adhere to the following without invoking secrecy :

- Directly report STRs to the FIU without any delay, via the electronic system of the FIU or by any other means approved by the FIU.
- Respond to all additional information requested by the FIU.

The Company assures that their managers, officials or staff, will not disclose, directly or indirectly, to the Customer or any other person(s) that they have reported, or are intending to report a Suspicious Transaction, nor will they disclose the information or data contained therein, or that an investigation is being conducted in that regard.

INTERNAL AUDIT

Internal Audit shall ensure compliance with policies, procedures, and controls relating to prevention of money laundering and terrorist financing, including the testing of the system for detecting suspected money laundering transactions, evaluating and checking the adequacy of exception reports generated on large and/or irregular transactions, the quality of reporting of suspicious transactions and the level of awareness of front line staff of their responsibilities in this regard.

EMPLOYEE'S TRAINING

PEAK INTERNATIONAL TRADING CO. L.L.C has an ongoing employee training under the leadership of the Compliance Officer.

The training includes, *inter alia*:

- How to identify red flags and signs of money laundering that arise during the course of the employees' duties;
- What to do once the risk is identified?
- What are the employees' roles in the company's compliance efforts and how to perform them;
- The company's record retention policy; and
- The disciplinary consequences for non-compliance with the Act.

Means of the training may include educational pamphlets, videos, internet systems, in-person lectures, and explanatory memos. The operations are reviewed periodically to see if certain employees, such as those in compliance, margin, and corporate security, require additional specialized training.

CONFIDENTIAL REPORTING OF AML NON-COMPLIANCE

The Managers, officials or staff, will not disclose, directly or indirectly, to the Customer or any other person(s) that they have reported, or are intending to report a Suspicious Transaction, nor shall they disclose the information or data contained therein, or that an investigation is being conducted in that regard.

REVIEW

The Company conducts a periodic review of the policy. In case of amendment in statutory provisions/ regulations necessitating amendment, the relevant portions of policy shall be deemed to have been modified from the date of amendment in relevant statutory provisions. In such case, the modified policy shall be placed for review by the Board in regular course.

COMMUNICATION

The Compliance Officer shall ensure that this policy is communicated to all management and relevant staff including Customers and all concerned.

DISCLAIMER

- Any employee who has reasons to believe that **PEAK INTERNATIONAL TRADING CO. L.L.C** might be or has been exposed to funds from a doubtful source should come forward to management immediately.
- Any employee who is found in violation of the terms of this Policy will be subject to disciplinary action.
- Any employee with direct knowledge of potential or apparent violations of this Policy who fails to report such acts to Company management will also be subject to disciplinary action.
- Any employee who knowingly misleads or hinders an investigation to reported violations of the Policy and any relevant and applicable law also may be subject to disciplinary action.
- Disciplinary actions may risk termination of employment. The same applies to third-parties that are associated with **PEAK INTERNATIONAL TRADING CO. L.L.C** operations. Third-parties risk having their contracts re-evaluated or terminated.

SIGNATURE



NAME : SERCAN SAMET ONDER

DESIGNATION : GENERAL MANAGER

DATE : 17/02/2024