

# **Anti-Money Laundering Policy and Counter-Terrorist Financing (CTF) Compliance**

## **1. Introduction**

Metaco is committed to the highest standards of anti-money laundering (AML) and counter-terrorist financing (CTF) compliance. We understand the importance of preventing our business from being used to launder money or finance terrorist activities.

This policy sets out our commitment to AML and CTF compliance, and the procedures that we have in place to meet our obligations.

## **2. Definitions**

- **Money laundering:** The process of concealing the origins of illegally obtained money.
- **Terrorist financing:** The process of providing financial support to terrorist organizations.
- **Customer Due Diligence (CDD):** The process of verifying the identity of our customers and understanding their business.
- **Suspicious Transaction Report (STR):** A report that we must submit to the authorities if we suspect that a transaction may be related to money laundering or terrorist financing.

## **3. AML Compliance Officer**

In case of any suspicious activity or If you have any concerns about our AML and CTF compliance, reach out at [compliance@metacointelligence.ae](mailto:compliance@metacointelligence.ae)

## **4. Risk Assessment**

- Conduct a risk assessment to identify and understand money laundering risks associated with the organization's activities, products, and services.
- Develop a risk-based approach to allocate resources effectively

## **5. AML and CTF Obligations**

We are subject to a number of AML and CTF obligations, including:

- The Federal Decree-Law No. 20 of 2018 on Anti-Money Laundering and Combating the Financing of Terrorism (AML/CFT Law).
- The Financial Action Task Force (FATF) Recommendations.

## **6. Customer Due Diligence (CDD)**

- Establish procedures for identifying and verifying the identity of customers.
- Understanding the customer's business
- Assessing the customer's risk of money laundering or terrorist financing
- Define enhanced due diligence measures for higher-risk customers.
- Describe ongoing monitoring of customer accounts for suspicious activities.

#### **7. Know Your Customer (KYC)**

- Define the information required to know the customer's background, purpose of the relationship, and the source of funds.
- Verify the beneficial ownership of legal entities and high net worth individuals

#### **8. Suspicious Activity & Transaction Reporting (SATR)**

- Establish procedures for employees to report suspicious activities internally.
- Define the process for filing Suspicious Activity Reports with the appropriate authorities

#### **9. Transaction Monitoring**

- Implement a system to monitor transactions and detect unusual or suspicious patterns.
- Describe the process for investigating flagged transactions and resolving potential AML concerns.

#### **10. AML Training**

- Provide regular AML training for employees, ensuring they are aware of AML regulations and their role in compliance.
- Document training sessions and maintain records of attendance.
- Metaco will enforce its AML/CFT policy. Employees who violate the policy will be subject to disciplinary action, up to and including termination of employment.

- **Policy Acknowledgment:** Require employees to acknowledge their understanding and compliance with the AML policy.

#### **11. Record Keeping**

- Define record-keeping requirements for customer information, transactions, and AML compliance-related documentation.
- Specify the retention period for records.

#### **12. Sanction Compliance**

- Establish procedures for complying with international sanctions programs.
- Regularly screen customers and transactions against relevant sanctions lists.

#### **13. Third-Party Due Diligence**

Metaco will conduct regular audits of the AML/CFT program. The audits will be conducted by an independent auditor. The audits will assess the effectiveness of the AML/CFT program and identify any areas for improvement.

#### **14. Internal Controls and Reporting**

- Develop internal controls to ensure compliance with the AML policy.
- Establish mechanisms for regular reporting to senior management and the board of Directors.

#### **15. Monitoring and Review**

Our AML and CTF compliance program is subject to regular monitoring and review. We will review our program on a regular basis to ensure that it is effective in meeting our obligations.

#### **16. Non-Retaliation**

Assure employees that they will not face retaliation for reporting suspicious activities or potential AML violations.

#### **17. Penalties for Non-Compliance**

Outline the consequences of non-compliance with the AML policy, including disciplinary actions and potential legal consequences.

#### **18. Disclaimer**

This policy is not a contract and does not create any legally binding obligations between Metaco and its employees and its users. Metaco does not guarantee that its AML/CFT program will prevent all money laundering or terrorist financing activity. Employees are responsible for complying with the policy and for reporting any suspected violations to their supervisor.

## **19. Conclusion**

We are committed to the highest standards of AML and CTF compliance. This policy provides a clear framework for our employees to follow, and that will help us to meet our obligations.