



Anti-Money Laundering (AML) and Counter- Terrorism Financing (CTF) Policy

Last Updated: March 2025

1. Introduction

YWO (CM) Ltd (hereinafter referred to as the “**Company**”) is a company registered with the registrar of Mwali International Business Authority in the Autonomous Island of Mwali (Moheli) – Comoros Union, with registration No. HT00225012. The Company is committed to maintaining the highest standards of integrity and preventing financial crime, including money laundering and terrorist financing.

This Anti-Money Laundering (AML) and Counter-Terrorism Financing (CTF) Policy outlines the framework, responsibilities, and procedures that the Company follows to comply with applicable laws and regulations related to financial crime prevention. The policy applies to all employees, officers, directors, and affiliates of the Company.

2. Purpose and Scope

The purpose of this policy is to:

- Establish a framework for detecting and preventing money laundering, terrorist financing, and other financial crimes.
- Ensure compliance with relevant regulatory and legal requirements.
- Protect the Company from being used for illegal activities.
- Set out clear procedures for risk assessment, due diligence, and reporting suspicious activities.

This policy applies to all employees, contractors, clients, and business partners associated with the Company.

3. Regulatory Compliance

The Company complies with all applicable AML and CTF laws, including the relevant legislation issued by regulatory authorities in the Union of Comoros. The Company ensures that its policies, procedures, and controls are regularly updated to reflect changes in the regulatory environment.

4. Customer Due Diligence (CDD)

The Company implements a risk-based approach to customer due diligence (CDD) to identify and verify clients before establishing a business relationship. The following measures are taken:

- **Identification and Verification:** The Company requires customers to provide valid identification documents, such as a passport, national ID card, or driver's license.
- **Proof of Address:** Clients must provide a recent utility bill, bank statement, or other official document verifying their residential address.
- **Purpose and Nature of Business Relationship:** The Company collects information regarding the purpose and nature of a client's transactions to assess potential risks.
- **Beneficial Ownership Identification:** The Company identifies the ultimate beneficial owners (UBOs) of corporate clients to prevent anonymity in transactions.
- **Enhanced Due Diligence (EDD):** Additional measures are taken for high-risk clients, such as politically exposed persons (PEPs), those operating in high-risk jurisdictions, or clients with complex ownership structures.

5. Politically Exposed Persons (PEPs)

The Company follows enhanced due diligence measures for politically exposed persons, their family members, and close associates. The following actions are required before onboarding a PEP:

- Senior management approval is required.
- Source of funds and wealth must be established.
- Enhanced monitoring of transactions is conducted throughout the relationship.

6. Ongoing Monitoring

The Company continuously monitors customer transactions to detect unusual or suspicious activity. This includes:

- Reviewing transactions to ensure consistency with the client's known profile and expected behavior.
- Identifying and analyzing large, unusual, or high-risk transactions.
- Conducting periodic reviews of client documentation and updating records as necessary.

7. Suspicious Activity Reporting (SAR)

Employees must report any suspected money laundering or terrorist financing activity to the designated AML Compliance Officer. The Company shall promptly report suspicious transactions to the Supervisory Authority in accordance with regulatory requirements.

Indicators of suspicious activity may include, but are not limited to:

- Transactions that appear inconsistent with a client's known financial profile.
- Unusually large cash transactions.
- Transactions involving high-risk jurisdictions.
- Sudden and unexplained changes in account activity.

8. Record-Keeping

The Company maintains records of all transactions and due diligence documents for at least five years. This includes:

- Copies of identification documents.
- Transaction history and supporting documents.
- Records of internal and external suspicious activity reports.

9. Employee Training and Awareness

All employees receive AML and CTF training to recognize and respond to potential money laundering and terrorist financing risks. Training covers:

- Legal and regulatory requirements.
- Identifying and reporting suspicious activity.

- Customer due diligence and risk assessment procedures.

Training is conducted regularly and updated to reflect changes in legislation and emerging risks.

10. Risk Assessment

The Company conducts regular risk assessments to identify and mitigate potential money laundering and terrorism financing threats. The assessment considers factors such as:

- Client risk (e.g., high-net-worth individuals, PEPs, complex ownership structures).
- Transaction risk (e.g., high-value transfers, cross-border transactions).
- Geographic risk (e.g., clients from high-risk countries).

11. Internal Controls and Independent Audits

The Company implements internal controls to ensure compliance with AML and CTF regulations. These controls include:

- Regular audits of AML procedures.
- Compliance checks on transactions and customer activity.
- Periodic reviews of policies and procedures.

An independent audit function assesses the effectiveness of the Company's AML and CTF measures and reports findings to senior management.

12. Consequences of Non-Compliance

Failure to comply with AML and CTF regulations may result in severe consequences, including:

- Regulatory penalties and fines.
- Criminal prosecution.
- Reputational damage.
- Termination of business relationships.

Employees who fail to adhere to AML and CTF policies may face disciplinary action, including termination of employment.

13. Contact Information

For further information or inquiries regarding this policy, please contact the AML Compliance Officer at support@ywo.com.