

ANTI-MONEY LAUNDERING (AML) POLICY

DARALDHAHAB TRADING Company Company No. 2024-00567 Saint Lucia
November , 2024

1. Introduction and Purpose

This comprehensive Anti-Money Laundering (AML) Policy establishes the framework and procedures implemented by DARALDHAHAB TRADING Company to prevent and detect money laundering, terrorist financing, and other financial crimes. Our commitment extends to:

- Establishing robust systems and controls
- Implementing comprehensive customer due diligence
- Maintaining detailed transaction records
- Training all employees in AML procedures
- Cooperating with law enforcement
- Protecting our company's reputation

2. Regulatory Framework

DARALDHAHAB TRADING Company adheres to:

- Financial Action Task Force (FATF) Recommendations
- Saint Lucia Money Laundering Prevention Act
- International AML Standards
- UN Security Council Resolutions
- Regional Financial Regulations

3. Customer Due Diligence (CDD)

3.1. Basic Due Diligence Requirements:

- Government-issued photo ID verification
- Proof of address verification
- Source of funds documentation
- Business registration (for entities)

3.2. Enhanced Due Diligence Triggers:

- High-risk jurisdictions
- Politically Exposed Persons (PEPs)

- Complex ownership structures
- High-value transactions
- Unusual patterns

3.3. Ongoing Monitoring:

- Regular profile reviews
- Transaction monitoring
- Risk reassessment
- Document updates

4. Risk Assessment

4.1. Customer Risk Categories:

- Low Risk: Regulated entities
- Medium Risk: International traders
- High Risk: PEPs, complex structures

4.2. Geographic Risk Factors:

- FATF high-risk jurisdictions
- Sanctioned countries
- Tax havens

4.3. Transaction Risk:

- Large cash transactions
- Cross-border transfers
- Complex patterns

5. Reporting Requirements

5.1. Internal Reporting:

- Suspicious activity reporting
- Transaction monitoring alerts
- Investigation procedures

5.2. External Reporting:

- Regulatory filings
- Law enforcement cooperation
- Annual compliance reports

5.3. Record Keeping:

- 7-year retention period
- Secure storage systems
- Regular audits

6. Training and Compliance

6.1. Staff Training:

- Initial AML training
- Annual refresher courses
- Role-specific modules
- Assessment requirements

6.2. Compliance Structure:

- Chief Compliance Officer
- AML Team
- External consultants
- Regular audits