

ANTI-MONEY LAUNDERING AND KNOW YOUR CUSTOMER POLICY

Introduction

COMMO T Co., Ltd. (hereafter “COMMO T”) Anti-Money Laundering and Know Your Customer Policy (hereinafter – the “AML & KYC Policy”) is designed to strictly prohibit and actively pursue the prevention of money laundering and any activities that facilitates money laundering and combating the financing of terrorism. This Policy sets standards for identification of customers in order to prevent the use of COMMO T products and services for money laundering and financing of terrorism purposes. COMMO T requires its officers, employees and its affiliates to adhere to these standards in preventing the use of its products and services for money laundering and financing of terrorism purposes, as well as, misused for money laundering, financing of terrorism or any other financial offense, by complying the following:

- Performing an enterprise-wide risk assessment to determine the risk profile of the COMMO T;
- Establishing AML & KYC policy and procedures;
- Implementing internal controls throughout its operations that are designed to mitigate risks of money laundering and financing of terrorism;
- Performing KYC procedures on all users;
- Designating a compliance officer or a compliance team with full responsibility for the AML & KYC program; and
- Providing AML & KYC training to all employees regularly.

Money Laundering

Money laundering refer to:

- The conversion or transfer of property, knowing that such property is the proceeds of any predicate offence, for the purpose of concealing or disguising the illicit origin of the property or of helping any person who is involved in the commission of any predicate offence to evade the legal consequences of his or her action;
- The concealment or disguise of the true nature, source, location, disposition, movement or ownership of or rights with respect to property, knowing that such property is the proceeds of offences;
- The acquisition, possession or use of property, knowing that such property is the proceeds of offence; or
- Any form of participation in, and attempts to commit, aiding and forcing somebody to commit any of the acts defined in the Law on Anti-Money Laundering and Combating the Financing of Terrorism and other related Law and regulations.

Financing of Terrorism

Financing of terrorism refer to the willful provision of financial or other services with the intention that such services be used or in the knowledge that they are or may be used, in full or in part, for the purpose of supporting terrorism, terrorist acts or terrorist organizations.

AML & KYC Policy Framework

The AML & KYC Policy are designed to:

- Prevent COMMO T from being used, intentionally or unintentionally, by criminal elements for Money Laundering and Financing of Terrorism activities;
- Enable COMMO T to know and understand its customers, clientele, contributors, and other contact with which has any financial dealing with and their financial background and source of funds better, which in turn would help it to manage its risks prudently;
- Put in place appropriate controls for detection and reporting of suspicious activities in accordance with applicable laws, procedures and regulatory guidelines; and
- Equip employees and contractors of COMMO T with the necessary training and measures to deal with matters concerning AML & KYC procedures and reporting obligations.



Customer Identification

The customer identification procedure will be carried out:

- Before establishing any business relation;
- Before any financial transaction can be made; and
- When there is any doubt about the authenticity, veracity, or adequacy of the previously obtained clients' identification data

When there shall be any suspicion of Money Laundering and Financing of Terrorism activities, or where there shall be any doubt about the adequacy or veracity of previously obtained clients' identification data:

- The Customer Due Diligence (CDD) Measures under the Article 8 of the Law on Anti-Money Laundering and Combating the Financing of Terrorism shall be reviewed,
- Including verifying the identity of the client again and obtaining information regarding the purpose and intended nature of the relationship with COMMO T,
- Along with the Special Monitoring of Certain Transactions (Article 10) and Reporting Cash or Suspicious Transactions to the Financial Intelligence Unit (Article 12).

Article 8: Customer Due Diligence Measures of the Law on AML and CFT

1. Reporting entities referred in Article 4 of the Law on Anti-Money Laundering and Combating the Financing of Terrorism shall implement customer due diligence measures to manage and reduce their risk on money laundering and financing of terrorism. Based on this measure, reporting entities shall evaluate and understand their risk of money laundering and financing of terrorism and shall implementing appropriate customer due diligence measures to manage and reduce this risk. Reporting entities shall tighten the implementation of customer due diligence measures when there is high risk and normal implementation of customer due diligence measures when there is low risk.
2. The obligation for the tighten implementation of customer due diligence measures and normal implementation of customer due diligence measures shall define in the guidelines of the CAFIU.
3. In the purpose of implementing the risks evaluation of money laundering and financing of terrorism as stated in paragraph 1 of this Article, reporting entities shall follow the guidelines of the CAFIU.
4. Reporting entities referred in Article 4 of the Law on Anti-Money Laundering and Combating the Financing of Terrorism shall take customer due diligence measures, including the identification of their customers and the verification of their customers' identity:
 - a) prior to establishing business relations, such as opening accounts, taking stocks, bonds or other securities into safe custody, granting safe-deposit facilities or engaging in any other business dealings;
 - b) prior to carrying out occasional or one-off transactions that involve a sum in excess of amount as defined by the CAFIU, including wire transfers shall contain the name and address of the originator and ultimate beneficial owners where an account exists with the number of that account else in the absence of an account, a unique reference number shall be included;
 - c) if the reporting entity has a suspicion of money laundering or financing of terrorism irrespective of the sum involved in the transaction;
 - d) if the reporting entity has any doubts about the veracity or adequacy of previously obtained customer identification data.
5. The following customer due diligence measures shall be taken by reporting entities:
 - a) identifying the customer by obtaining at the minimum name, birth date, and address, for natural persons and name, articles of incorporation or registration, tax identification number, address, telephone number, for legal persons as defined in the guidelines by the CAFIU and verifying that customer's identity using reliable, independent source documents, data or information by using a national ID card, a passport or any other official photo ID document.
 - b) identifying the ultimate beneficial owner, and taking reasonable measures to verify the identity of the beneficial owner such that the reporting entities is satisfied that it knows who the beneficial owner is. For legal persons and arrangements, the reporting entities should take reasonable measures to understand the ownership and control structure of the customer. When it is not possible to identify the any legal person as the ultimate beneficial owner of the legal entities, the legal person who is the senior manager will be the ultimate beneficial owner.



- c) obtaining information on the purpose and intended nature of the business relationship.
- d) identifying the customer or the ultimate beneficial owner as politically exposed persons or their family members or the closest relatives to the PEPs shall implementing the customer due diligence measures in accordance to the level of risk that has been evaluated with the obligation of the Law on Anti-Money Laundering and Combating the Financing of Terrorism and other guidelines by the CAFIU.
- e) conducting ongoing due diligence on the business relationship:
 - scrutiny of transactions undertaken throughout the course of that relationship to ensure that the transactions being conducted are consistent with the reporting entities, knowledge of the customer, their business and risk profile including, where necessary, the source of funds.
 - fully update the documents, data and information that have been collected in the customer due diligence measures through reviewing existing records, especially those customers with high risk level.
6. Where the reporting entity is unable to comply with paragraphs 5 of the present Law, reporting entity should not open the account, commence business relations or perform the transactions, or in case of existing business relations with the customer, it should terminate such business relations unless instructed to the contrary by the CAFIU. In any such cases the reporting entity should consider making a suspicious transaction report in relation to the customer.
7. Where the reporting entity comply with the customer due diligence measures and suspicious any customer in relation with the money laundering or financing of terrorism and believe that the continuity of implementing of customer due diligence measures will make the customer realize that they are being suspected; that reporting entity can discontinue the implementing of customer due diligence measures and report the suspicious transactions.
8. The requirements set forth by paragraph 4 through 7 of the present Law shall apply to all new customers as well as to existing customers on the basis of materiality and risk. Reporting entities shall conduct due diligence on such existing relationships retrospectively.
9. Reporting entities shall comply normal customer due diligence measures when assessing the risk of money laundering and/or financing of terrorism in accordance to the obligation as stated in the guidelines of the CAFIU.
10. Reporting entities shall comply tighten customer due diligence measures for the commence business relations or perform the transactions as stated in Article 10 of the Law on Anti-Money Laundering and Combating the Financing of Terrorism and other commence business relations or perform the transactions as follows:
 - a) commence business relations or perform the transactions with high risky institutions or individuals or jurisdictions of money laundering and/or financing of terrorism.
 - b) commence business relations or perform the transactions with foreign politically exposed persons and other family members or the closest relatives to the PEPs.
 - c) commence business relations or perform the transactions with local politically exposed persons and international politically exposed persons and other family members or the closest relatives to the PEPs when the commence business relations or perform the transactions has evaluated as high risk.
 - d) commence business relations or perform the transactions with high risky evaluation on money laundering and/or financing of terrorism.
11. Reporting entities shall comply tighten customer due diligence measures in accordance to the high-risk level and shall implement other obligation in relation with the paragraph 10 of this Article or high-risk products and services as defined in the guidelines by the CAFIU.
12. Reporting entities shall ensure the understanding of risks on money laundering and financing of terrorism and manage the internal auditing as defined in the guidelines by the CAFIU to manage and reduce that risks.
13. Reporting entities in the financial group or reporting entities with foreign branches or with foreign subsidiaries that holds majority shares shall comply with the joint program as stated in Article 16 of the Law on Anti-Money Laundering and Combating the Financing of Terrorism of the financial group in accordance with anti-money laundering and combating of financing of terrorism.



14. Reporting entities shall comply combating measures as defined in the guidelines of the CAFIU for the risk reduction on money laundering and financing of terrorism from foreign juridical as appropriate or as required by the FIU or Asia/Pacific Group on Money Laundering.
15. Reporting entities shall comply appropriately on financial sanctions to their customers.
16. Reporting entities as in paragraph 9 of Article 4 of the Law on Anti-Money Laundering and Combating the Financing of Terrorism shall comply with paragraph 1 through 15 of this Article and other guidelines by the CAFIU released in accordance with the Law on Anti-Money Laundering and Combating the Financing of Terrorism in relation with the customer due diligence measures during processing any transactions for or with their customers on buying or selling real estate.
17. Reporting entities in paragraph 10 and paragraph 13 of Article 4 of the Law on Anti-Money Laundering and Combating the Financing of Terrorism shall comply with paragraph 1 through 15 of this Article and other guidelines by the CAFIU released in accordance with the Law on Anti-Money Laundering and Combating the Financing of Terrorism in relation with the CDD measures during processing any transactions with their customers with equal or exceeding of the limiting by the guidelines of the CAFIU.

Article 10: Special Monitoring of Certain Transactions of the Law on AML and CFT

1. A Reporting entity shall pay special attention to:
 - a. any complex, unusual or large amount transactions;
 - b. any unusual patterns of transactions; that have no apparent to visible economic or lawful purpose;
 - c. business relations and transactions with institutions or persons in jurisdictions that do not have adequate systems in place to prevent or deter money laundering or financing of terrorism;
 - d. wire transfers that do not contain complete originator information;
 - e. business relations and transactions with persons with whom the reporting entity has had no face-to-face contact during the implementation of identification procedure;
 - f. business relations and transactions with politically exposed persons;
 - g. business relations and transactions conducted by means of cross-border correspondent banking or other similar relationships.
2. In cases referred to under paragraph 1 of this Article, the reporting entity shall seek additional information as to the origin and destination of the money, the purpose of the transaction and the identity of the transacting parties.

Article 12: Reporting Cash or Suspicious Transaction to the CAFIU of the Law on AML and CFT

1. Reporting entities referred to at Article 4 of the Law on Anti-Money Laundering and Combating the Financing of Terrorism shall report to the CAFIU any cash transaction exceeding the amount of the threshold as defined by the supervisory authority, as well as such transactions, which involve several connected cash transactions whose total value exceeds the same amount.
2. Irrespective of the reporting obligation set forth by paragraph 1 of this Article, if a reporting entity suspects or has reasonable grounds to suspect that funds are the proceeds of offense, or are related to the financing of terrorism, it shall promptly, within 24 hours, report its suspicions to the CAFIU.
3. Reports of suspicions shall be transmitted to the CAFIU by any expeditious means of communication, such as facsimile or, failing which, by any other written means. Reports communicated by telephone shall be confirmed by facsimile or any other written means within the shortest possible time. The CAFIU shall acknowledge receipt of the report upon receipt thereof.
4. A reporting entity that has made a report to the CAFIU, as well as any other entity that holds information related to the transaction or customer involved in the report, shall give the CAFIU or a law enforcement agency that is carrying out an investigation arising from, or relating to the information contained in the report, any further information that it has about the transaction or attempted transaction or the parties to the transaction if requested to do so by the CAFIU or the law enforcement agency.
5. If the CAFIU has reasonable grounds to suspect that a transaction or a proposed transaction may involve a money laundering offense or an offense of financing of terrorism and for reasons of the seriousness or the urgency of the case it considers necessary, it may direct the reporting entity in writing or by telephone to be followed up in writing, not to proceed with the carrying out of that



transaction or proposed transaction or any other transaction in respect of the funds affected by that transaction or proposed transaction for a period as may be determined by the CAFIU, which may not exceed 48 hours, in order to allow the CAFIU:

- a) to make necessary inquiries concerning the transaction; and
- b) if the CAFIU deems it appropriate, to inform and advise a law enforcement agency.

Sanctions

According to the Law on Anti-Money Laundering and Combating the Financing of Terrorism of Cambodia, the following sanctions will be applying by the local authorities and supervisory authorities if there is any activities or actions that are the offense relating with the money laundering and financing of terrorism:

Article 31: Freezing and Confiscation of Personal Property of the Law on AML and CFT

1. The member appointed by the National Coordination Committee can freeze the property and take other appropriate action temporarily as soon as possible when there's suspicious or other reasonable basis for suspicious to be related property or property arising out of the offense before requesting for the court decision with the purpose of detaining the property as the subject of confiscation as stated in Article 32 (Confiscation of Property) of the Law on Anti-Money Laundering and Combating the Financing of Terrorism.
2. After the law enforcement authorities acknowledge the present of the relating, suspicious to be related property arising out of the offense shall restrained the property without delay and as soon as possible, then file a lawsuit to the court for freezing of the property.

Article 32: Confiscation of Property of the Law on AML and CFT

1. In the guilty state of money laundering or evidence of the offense or financing of terrorism, the court can issue order to confiscation:
 - a) property arising out of the offense such as combined properties or the changed properties; or
 - b) property that are the income or other benefits that arising out of the offense; or
 - c) any device, material or object that has been used in committing offense; or
 - d) property that has been stated in part a-to-c of this Article that has been transferred to other individual unless there is evidence prove that the properties' owners obtained by paying actual fees or has provided services in return which appropriate with the price of the property or other legal basis and that individual must unknown the illegal source of that property; or
 - e) property of the perpetrator involved with in the offense worth equal to the value of the property arising out of the offense.
2. In case the court found the offense guilty related with the money laundering or evidence of the offense or financing of terrorism, even though the perpetrator has not convicted by the court order due to unknown identity or death, the court still can order to confiscation of the property that has been frozen if there is enough evidence proved that the property arising out of the offense.
3. In addition to the confiscation of property as stated in part a-to-e of this Article, the confiscation of property as stipulated in the existing Penal Code of the Kingdom of Cambodia will be taken for implementation.

Article 33: Combined Properties of the Law on AML and CFT

Once the property is related or appropriately suspicious to be related to the offense or the property arising out of the offense has been combined with other property that is not related to the offense or the property arising out of the offense that need to be confiscating on the basis of Article 31 (Freezing and Confiscation of Personal Property) or Article 32 (Confiscation of Property) of the Law on Anti-Money Laundering and Combating the Financing of Terrorism shall not exceeding the value of the property that is related or appropriately suspicious to be related to the offense or the property arising out of the offense.

Article 34: Opposition to the Decision Burden of the Law on AML and CFT

Any individual appeal to the decision on the basis of Article 31 (Freezing and Confiscation of Personal Property) or Article 32 (Confiscation of Property) stated above to withdrawal the property which has



been ordered to detaining or confiscating or appeal to opposition this decision shall prove the court on their legal right on that property and that property does not relate to the offense or relating to the property arising out of the offense.

Article 35: Freezing of Fund related to Financing of Terrorism of the Law on AML and CFT

Even if there are provisions of other laws, funds that belong to the terrorist, individual who financing to terrorism and terrorist organizations as declared in the declaration of the United Nation Security Council No 1267, No 1373 and other declaration after shall have been freeze without any delay based on the mechanisms and procedures as defined by any legal documents.

Article 36: Sanctions of the Law on AML and CFT

1. Sanction in the Law on Anti-Money Laundering and Combating the Financing of Terrorism including the disciplinary sanctions and the penal sanctions.
2. Disciplinary sanctions such as:
 - a) the warning;
 - b) the reprimand;
 - c) the prohibition or limitation to conduct any transactions for a period of time as indicated by the supervisory authorities;
 - d) the revocation of the business license;
 - e) the proposal to a demotion of relevant officials or directors of the reporting entities;
 - f) the fine;
3. Penal sanctions including the fine and sentenced to imprisonment.

Article 38: Money Laundering of the Law on AML and CFT

1. Money laundering activities will be sentenced to imprisonment from two years to five years, and will be subjected to a fine from 100,000,00 (one hundred million) riels to 500,000,000 (five hundred million) riels or to the value of the capital or property that is the subject of the money laundering.
2. Provision of Article 406 (Aggravating Circumstances) through 408 (Additional Penalties: Nature and Duration) of the Penal Code shall be the subject of implementation.
3. Legal entities shall declare to criminally responsible in accordance to Article 42 (Criminal Responsibility of Legal Entities) of the Penal Code for the money laundering offense.
4. Legal entities will be subjected to a fine from 200,000,000 (two hundred million) riels to 1,000,000,000 (one billion) riels as well as additional penalties as stated in Article 43 (Additional Sanctions to Legal Entities) of the Law on Anti-Money Laundering and Combating the Financing of Terrorism.

Article 39: Refusal to Provide Information of the Law on AML and CFT

1. Any individual who purposely refuse to provide information to the CAFIU and supervisory authorities as stated in Article 6 of the Law on Anti-Money Laundering and Combating the Financing of Terrorism will be sentenced to imprisonment from six days to one month, and will be subjected to a fine from 10,000,000 (ten million) riels to 100,000,000 (one hundred million) riels or any one thereof.
2. Legal entities shall declare to criminally responsible in accordance to Article 42 (Criminal Responsibility of Legal Entities) of the Penal Code for the offense in the paragraph 1 of this Article.
3. Legal entities will subject to a fine from 50,000,000 (fifty million) riels to 200,000,000 (two hundred million) riels as well as additional penalties as stated in Article 43 (Additional Sanctions to Legal Entities) of the Law on Anti-Money Laundering and Combating the Financing of Terrorism.

Article 40: Failure to Report Transactions of the Law on AML and CFT

1. Any individual who purposely not reporting on cash transactions or suspicious transactions to the CAFIU as stated in Article 12 of the Law on Anti-Money Laundering and Combating the Financing of Terrorism will be sentenced to imprisonment from one month to one year, and will be subjected to a fine from 50,000,000 (fifty million) riels to 200,000,000 (two hundred million) riels or any one thereof.
2. Legal entities shall declare to criminally responsible in accordance to Article 42 (Criminal Responsibility of Legal Entities) of the Penal Code for the offense in the paragraph 1 of this Article.



3. Legal entities will subject to a fine from 200,000,000 (two hundred million) riels to 500,000,000 (five hundred million) riels as well as additional penalties as stated in Article 43 (Additional Sanctions to Legal Entities) of the Law on Anti-Money Laundering and Combating the Financing of Terrorism.

Article 41: Reporting Obligation Violation and Reporting Restriction of the Law on AML and CFT

1. Any individual obligated to reports or submits report as stated in Article 13 of the Law on Anti-Money Laundering and Combating the Financing of Terrorism or any individual who knows the information but intends to report violating to the provision of Prohibition of Tipping Off as stated in Article 15 of the Law on Anti-Money Laundering and Combating the Financing of Terrorism will be sentenced to imprisonment from one month to one year, and will be subjected to a fine from 50,000,000 (fifty million) riels to 200,000,000 (two hundred million) riels or any one thereof.
2. Legal entities shall declare to criminally responsible in accordance to Article 42 (Criminal Responsibility of Legal Entities) of the Penal Code for the offense in the paragraph 1 of this Article.
3. Legal entities will subject to a fine from 200,000,000 (two hundred million) riels to 500,000,000 (five hundred million) riels as well as additional penalties as stated in Article 43 (Additional Sanctions to Legal Entities) of the Law on Anti-Money Laundering and Combating the Financing of Terrorism.

Article 42: Violating Obligation of Confidentiality of the Law on AML and CFT

1. Any individual who purposely violating obligation of confidentiality as stated in Article 24 of the Law on Anti-Money Laundering and Combating the Financing of Terrorism will be sentenced to imprisonment from one month to one year, and will be subjected to a fine from 50,000,000 (fifty million) riels to 200,000,000 (two hundred million) riels or any one thereof.
2. Legal entities shall declare to criminally responsible in accordance to Article 42 (Criminal Responsibility of Legal Entities) of the Penal Code for the offense in the paragraph 1 of this Article.
3. Legal entities will subject to a fine from 200,000,000 (two hundred million) riels to 500,000,000 (five hundred million) riels as well as additional penalties as stated in Article 43 (Additional Sanctions to Legal Entities) of the Law on Anti-Money Laundering and Combating the Financing of Terrorism.

Article 44: Financing of Terrorism of the Law on AML and CFT

1. Will be sentenced to imprisonment from ten years to 20 years to any individual who purposely provide or collect of property, fund, or other services with the intention that such services be used or in the knowledge that they are or may be used, in full or in part, for the purpose of supporting any form of activities related to travelling, training, preparing, participating, or committing terrorism by the terrorist or terrorist organization directly or indirectly for the benefit of:
 - a) any individual who committed the offense as prescribed in the Law on Anti-Money Laundering and Combating of Financing of Terrorism or other offense parallel to the Law of other foreign states; or
 - b) organization which is owns or supervise directly or indirectly by any individual stated in above part (a); or
 - c) any individual or organization acting on behalf of or under orders of any individual state in above part (a).
2. Any act that stated in the paragraph 1 of this Article is an offense although the property or resources or services are not the means of committing offense as stated in the Law on Anti-Money Laundering and Combating of Financing of Terrorism or other offense parallel to the Law of other foreign states.
3. Legal entities shall declare to criminally responsible in accordance to Article 42 (Criminal Responsibility of Legal Entities) of the Penal Code for the offense in the paragraph 1 of this Article.
4. Legal entities will subject to a fine from 200,000,000 (two hundred million) riels to 500,000,000 (five hundred million) riels as well as additional penalties as stated in Article 43 (Additional Sanctions to Legal Entities) of the Law on Anti-Money Laundering and Combating the Financing of Terrorism.

Politically Exposed Persons

Politically exposed persons refer to any individual who are local politician or related, foreign politician or related, or international politician or related, including:



1. Local politician or related refer to any individual who is or has been entrusted with prominent public functions of the Kingdom of Cambodia such as senior politician, senior government official, senior military or judicial official, senior executive of state-owned corporation or important party official.
2. Foreign politician or related refers to any individual who is or has been entrusted with prominent public functions of foreign country such as head of state or of government senior politician, senior government official, military or judicial official, senior executive of state-owned corporation or important party official.
3. International politician or related refers to any individual of an international organization who is or has been entrusted with prominent public functions such as senior management member, board of director member or organization member or similar.

Before establishing business relationships between any clients, COMMO T will screen all clients against global politically exposed persons lists before they are allowed. If the client is identified as politically exposed persons, COMMO T will process Enhanced Customer Due Diligence (EDD) measures. At the same time, senior management approval is necessary for establishing or continuing a business relationship with such customers.

Required Information

In according with the Guideline of the Securities and Exchanges Commission of Cambodia, the following information will be required to establishing the business relationship between client:

- Individual
 1. Full Name
 2. Former Name (if any)
 3. Sex
 4. Date of Birth
 5. Nationality
 6. ID Card/Passport Number
 7. ID Card/Passport Issuer
 8. ID Card/Passport Expiration Date
 9. Current Address
 10. Permanent Address
 11. Contact Number
 12. Email Address
 13. Occupation Information
 14. Marital Status
 15. Spouse Information
 16. Educational Information
 17. Purpose of the Investment
 18. Investment Experiences
 19. Income Information
 20. Beneficiary Information
 21. Emergency Contact
- Legal Entity
 1. Legal Entity Name
 2. Registration Number
 3. Registration Expiration Date
 4. TIN Number
 5. Nature of the Company
 6. Nature of the Business
 7. Company Address
 8. Representative's Name
 9. Representative's Sex
 10. Representative's Date of Birth
 11. Representative's Nationality
 12. Representative's ID Card/Passport Number
 13. Representative's ID Card/Passport Expiration Date
 14. Representative's Marital Status
 15. Representative's Position
 16. Representative's Current Address
 17. Representative's Contact Number
 18. Representative's Email Address
 19. Registered Capital
 20. Main Company Income
 21. CEO Information
 22. Controlling Person Information
 23. Shareholders' Information
 24. Profit Information
 25. Purpose of the Investment
 26. Investment Experiences
 27. Emergency Contact

Internal Controls

Reporting entities referred to at Article 4 of the Law on Anti-Money Laundering and Combating the Financing of Terrorism shall develop programs for the prevention of money laundering and the financing of terrorism in accordance with the guidelines of supervisory authority as stipulated in Article 31 of the Law on Anti-Money Laundering and Combating the Financing of Terrorism. Such programs shall include the following:

- a) Development of internal policy procedures and controls, including appropriate compliance arrangements and adequate screening procedures to ensure high standards when hiring employees;



- b) Designation of compliance officers at management level;
- c) Ongoing training for officials or employees;
- d) Internal audit function to check compliance with an effectiveness of the measures taken to apply the Law on Anti-Money Laundering and Combating the Financing of Terrorism.

Nominated Officer

The compliance officer is the person duly authorized by COMMO T, whose duty is to ensure the effective implementation and enforcement of the AML & KYC policy. It is the responsibility to supervise all aspects of COMMO T's Anti-Money Laundering and Combating the Financing of Terrorism, including but not limited to:

- Collecting clients' identification information;
- Establishing and updating internal policies and procedures for the completion, review, submission and retention of all reports and records required under the applicable laws and regulations;
- Monitoring transactions and investigating any significant deviations from normal act;
- Implementing a records management system for appropriate storage and retrieval of documents, files, forms and logs; and
- Providing law enforcement with information as required under the applicable laws and regulations.

According to Article 17 of the Law on Anti-Money Laundering and Combating the Financing of Terrorism, the compliance officer to be appointed at management level shall be a senior officer with relevant qualifications and experience to enable him/her to respond sufficiently well to enquiries relating to the reporting entity and the conduct of its business, and be responsible at minimum:

- For establishing and maintaining internal policy, procedures and manual of compliance;
- For ensuring compliance by staff of the reporting entity with the provisions of the Law on Anti-Money Laundering and Combating the Financing of Terrorism and any other law relating to money laundering or financing of terrorism and the provisions of policy, procedures and manual of compliance;
- To act as the liaison between the reporting entity and the Financial Intelligence Unit in matters relating to compliance with the provisions of the Law on Anti-Money Laundering and Combating the Financing of Terrorism and any other legislations with respect to money laundering or financing of terrorism.

Record-keeping

According to Law, Regulations, and Rules in force, verification document including all identifying information provided by a client, the methods used and results of verification, and the resolution of any discrepancies identified in the verification process, records containing a description of any document that relied on to verify a client identify, noting the type of document, any identification number contained in the document, the place of issuance, and if any, the date of issuance and expiration date, and other records of transaction shall maintain at least 10 (ten) years after the account has been closed or the business relations with the customer have ended, and shall hold at the disposal of the competent authorities any records of customer identification and records of transactions conducted by customers in a manner that they are sufficient to permit the reconstruction of individual transactions, including the amounts and types of currency involved if any, so as to provide, if appropriate, evidence for the prosecution of offense.

Training

COMMO T has planned and prepared a regular training program on AML and KYC Policy as follow:

1. All new employees will receive AML & KYC Policy training as part of the mandatory new-hire training program.
2. All front-line employees including derivative representatives and other applicable employees are also required to complete AML & KYC Policy training at least semi-annually.
3. Supervisors and managers are also required to complete the AML & KYC Policy training program.

Disclaimer

COMMO T reserves the right to change or amend this Anti-Money Laundering and Know Your Customer Policy without further notice to you. If COMMO T makes material changes to this AML & KYC Policy, we will provide a written notification through our website at commot.asia or other means of communication, if applicable. For further information and understanding, please reach out to us by info@commot.asia.

