

# ANTI-MONEY LAUNDERING & KNOWING YOUR CUSTOMER

## INTRODUCTION

Promo Leads adopts an Anti-Money Laundering / Counter-Terrorist Financing Policy and a Knowing Your Customer Policy (collectively, the “AML Policies”). These Policies are reviewed periodically and adjusted from time to time based on prevailing industrial standards and international legislation designed to facilitate the prevention of unlawful actions including money laundering and terrorist financing. All senior management and employees of Promo Leads are obliged to acknowledge and be familiar with the Policies.

## MONEY LAUNDERING RISKS

Money laundering is generally defined as being involved in acts designed to conceal or hide the true origins of illegally derived proceeds so that the proceeds appear to have derived from legitimate sources or constitute legitimate assets. Terrorist financing is an attempt to hide either the origin of the funds or their intended use, which could be for illegal purposes.

## AML POLICY FRAMEWORK

This Policy is designed to provide a framework to:

- Avoid that Promo Leads is used, intentionally or unintentionally, by criminal elements for money laundering or financing terrorist activities;
- Allow Promo Leads to know and understand its customers, clientele, contributors, and other contacts that Promo Leads does business with (collectively, “Clients”) and their background and source of funds better, which in turn would help them to manage its risks more carefully;
- Adopt appropriate controls for detection and reporting suspicious activities in accordance with applicable laws, procedures and regulatory guidelines;
- Ensure that employees and contractors of Promo Leads have received the necessary training and measures.

Our Policies will be reviewed and updated regularly to make sure that appropriate procedures and internal controls are set up to account for both changes in regulations and in our business.

## RISK-BASED APPROACH

Promo Leads uses and maintains a Risk-Based Approach (“RBA”) with respect to assessing and containing the money laundering and terrorist financing risks as a result from any transactions with Clients. The guidelines are as follows:

- Before entering into any transaction or proposed transaction, the necessary checks shall be carried out in line with the RBA to ensure that the identity of the Clients does not match with any person who has a known criminal background or with banned entities such as individual terrorists or terrorist organizations;
- To categorize the risk of the Clients, the relevant information shall be collected from the Clients upon or before entering into a transaction;
- The process to categorize the risk for different types of Clients may consider the background of the Clients, country of origin, sources of funds as well as social and financial background;
- The results of the risk categorization process shall be decided based on the relevant information provided by the Clients at the start of the business relationship;
- Promo Leads must be able to proof to the competent authorities that due diligence was observed based on the risk profile of the Client, in compliance with the relevant applicable legislations.

## CUSTOMER IDENTIFICATION

Customer Identification Procedures must be carried out:

- Before any transaction can be made;
- In case there is any doubt regarding the authenticity, veracity, or adequacy of the previously obtained Clients’ identification data.

In case there is any suspicion of money laundering or terrorism financing activities, or in case there is any doubt about the adequacy or veracity of previously obtained Clients’ identification data, the due diligence measures shall be reviewed, including verifying the identity of the Client again and collecting information about the purpose and intended nature of the relationship with Promo Leads.

- Requires Clients to provide proof of identification, proof of residence, proof of payment, source of funds and a signed copy of Promo Lead's declaration of transactions;

## SANCTIONS

Promo Leads does not open accounts or do business with individuals that are mentioned on prescribed sanctions lists.

## POLICITALLY EXPOSED PERSONS

Promo Leads does not open accounts or do business with individuals who are Politically Exposed Persons (PEPs), or are related thereto. Promo Leads checks all Clients against global PEP lists before they are allowed to establish a relationship with Promo Leads.

## INTERNAL CONTROLS

Promo Leads implements and maintains internal controls to ensure that all of its business operations comply with AML legal requirements and that all required reports are made on a timely basis.

## MONITORING AND REPORTING

Promo Leads diligently monitors transactions for suspicious activity. Transactions that are unusual are carefully assessed to determine whether it appears that they make no apparent sense or appear to be for an unlawful purpose. In case such suspicious activity is detected, our Compliance Officer will determine whether it is necessary to submit this to any law enforcement authority. Suspicious activity can entail more than just suspected money laundering attempts. Activity may be suspicious, and Promo Leads may wish to submit this to a law enforcement authority.

## RECORD-KEEPING

We document our verification, 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. We keep records including a description of any document that we used to verify a Client's identity, recording the type of document, any identification number mentioned in the document, the place of issuance, and if applicable, the date of issuance and expiry date. With respect to non-documentary verification, we retain documents that describe the methods and the results of any measures we took to verify the identity of a Client.