

Scope of Policy

This policy applies to all MY MAA MARKETS officers, employees, appointed representatives, and the products and services offered by the company. All departments and locations within MY MAA MARKETS will collaborate to ensure a unified approach to combating money laundering. Each business unit and location will implement risk-based procedures designed to prevent, detect, and report suspicious transactions. All activities related to these efforts will be thoroughly documented and retained.

The **AML Compliance Committee** will be responsible for:

1. **Handling Suspicious Activity Reports (SARs):** Initiating SARs or other mandatory reports to the appropriate law enforcement or regulatory agencies.
2. **Receiving External Inquiries:** Directing any communication from law enforcement or regulatory bodies to the AML Compliance Committee for appropriate action.

The committee shall:

- Receive internal reports regarding potential money laundering or suspicious activities.
- Investigate reports of suspicious events thoroughly and in a timely manner.
- Submit reports of relevant suspicious activities to the appropriate authorities.
- Ensure staff and appointed representatives are adequately trained and aware of anti-money laundering requirements.
- Provide an annual report to the company's governing body on the effectiveness and performance of the firm's AML systems and controls.
- Oversee the day-to-day implementation of anti-money laundering policies, particularly concerning:
 - Development and launch of new products.
 - Onboarding of new customers.
 - Adjustments to the company's business profile.

This policy underscores MY MAA MARKETS' commitment to maintaining compliance with anti-money laundering regulations and ensuring the integrity of its operations.

Policy-

MY MAA MARKETS is committed to actively preventing money laundering and any activities that enable money laundering or facilitate the funding of terrorism or other criminal activities. The company is dedicated to maintaining compliance with Anti-Money Laundering (AML) regulations as per applicable laws and expects all its officers, employees, and appointed representatives to adhere to these standards. This commitment is aimed at preventing the misuse of MY MAA MARKETS' products and services for unlawful purposes.

For the purposes of this policy, money laundering is broadly defined as any act undertaken to conceal or disguise the true origin of proceeds obtained through criminal activities, making such proceeds appear to have been derived from legitimate sources or converted into lawful assets.

This policy reflects MY MAA MARKETS' dedication to promoting a transparent and secure business environment while upholding its legal and ethical responsibilities.

What is Money Laundering?

Money laundering is the process through which money or assets obtained through criminal activities (referred to as "criminal property") are transformed into "clean" money or assets with no apparent connection to their illegal origins.

Criminal property may include cash, securities, tangible and intangible assets, or any other form of value. It also encompasses funds used to finance terrorism, regardless of their source.

Money laundering activities include:

- Acquiring, using, or possessing criminal property.
- Handling proceeds from crimes such as theft, fraud, or tax evasion.
- Being knowingly involved with criminal or terrorist property in any manner.
- Facilitating the laundering of criminal or terrorist property through arrangements.
- Investing the proceeds of crimes in financial products.
- Acquiring property or assets with the proceeds of crimes.
- Transferring criminal property through financial systems.

Money laundering is not limited to any single action. Techniques can range from simple transactions, such as purchasing and reselling luxury items, to complex webs of legitimate operations. Criminal property can take any legal form, such as money, real estate, rights, or other benefits. Knowing or suspecting that property originates from criminal activity and failing to report it makes an individual complicit in the laundering process.

Stages of Money Laundering:

1. **Placement:**
Initial introduction of illicit funds into the financial system, such as depositing cash into a bank account.
2. **Layering:**
A series of transactions designed to obscure the origin of the funds, making them appear legitimate.

3. **Integration:**

The reintroduction of laundered funds into the economy as "clean" money, allowing criminals to use the funds freely.

No business, including those in the financial sector, is immune to the risks posed by money laundering. MY MAA MARKETS recognizes the need to assess the money laundering risks associated with its products and services and remains vigilant in preventing criminal activities from infiltrating its operations.

What is Counter-Terrorist Financing (CTF)?

Counter-Terrorist Financing (CTF) refers to efforts to prevent the funding of terrorist activities or organizations. Terrorist financing involves the use of legitimate businesses or individuals who may willingly or unknowingly provide resources to support terrorism for ideological, political, or other reasons.

To mitigate this risk, MY MAA MARKETS ensures the following:

1. Customers and associated parties are thoroughly screened to confirm they are not affiliated with terrorist organizations.
2. Adequate measures are in place to prevent the company's products or services from being used as channels to fund terrorist activities.

Unlike money laundering, terrorist financing may not necessarily involve funds obtained through criminal activities. Instead, it often involves concealing the origin or intended use of legitimate funds, which are later redirected for criminal or terrorist purposes.

MY MAA MARKETS is committed to implementing robust monitoring and due diligence processes to detect and prevent any activity that could contribute to the financing of terrorism, thereby upholding its ethical and legal responsibilities.

Risk-Based Approach

MY MAA MARKETS adopts a risk-based approach to Anti-Money Laundering (AML) procedures. This approach ensures that the level of due diligence and resources allocated to any relationship is proportional to the level of risk associated with that relationship. The areas of risk are categorized as follows:

1. Customer Risk

Customers present varying levels of risk depending on their profiles and behaviors. A standard **Know Your Customer (KYC)** process is used to assess the risk level posed by each customer. For example:

- A near-retirement individual making consistent, small deposits aligned with their financial profile represents low risk.

- A middle-aged individual making irregular and varying-sized deposits that do not match their known financial details poses a higher risk, requiring enhanced due diligence.

Additionally, certain entities, such as corporate structures, may carry higher risk as they can introduce layers of complexity in transactions, making it easier for criminals to conceal the origins of funds. Customers are classified into different risk bands based on these evaluations.

2. Product Risk

The nature of the product or service itself determines its potential risk level as a money laundering tool.

- Products are categorized into **reduced risk**, **intermediate risk**, and **increased risk** based on their functionality. For instance:
 - Pure protection contracts are typically low risk.
 - Investment products, such as unit trusts, are considered high risk.
- The sales process also influences product risk. Transactions resulting from a thorough advisory process and KYC checks carry less risk compared to "execution-only" transactions, where limited customer information is available.

3. Country Risk

The geographic location of the customer or the origin of the business activity affects the risk level. This is due to varying levels of regulatory oversight and risks associated with different countries. Regions with weaker AML regulations or higher incidences of criminal activities pose a higher risk and require enhanced due diligence measures.

Implementation of Risk-Based Measures

MY MAA MARKETS ensures that due diligence is performed both at the initiation of a customer relationship and on an ongoing basis. The level of due diligence is determined based on the **customer risk**, **product risk**, and **country risk** associated with each relationship.

This structured approach helps MY MAA MARKETS effectively identify and mitigate risks while maintaining compliance with AML regulations.

Customer Identification Program (CIP)

MY MAA MARKETS has implemented a robust **Customer Identification Program (CIP)** to ensure compliance with Anti-Money Laundering (AML) regulations and to mitigate risks associated with unidentified or fraudulent activities.

As part of the CIP, MY MAA MARKETS will:

1. **Provide Notice to Customers:**

Customers will be informed that their identification information will be requested and verified as part of the onboarding process.

2. **Collect Customer Identification Information:**

A minimum set of identification details will be obtained from each customer. These details may include, but are not limited to:

- Full name
- Date of birth
- Residential or business address
- Government-issued identification numbers (e.g., passport, tax ID, or driver's license)

3. **Verify Customer Identity:**

The collected information will be verified using appropriate methods, such as:

- Validating identification documents against official records
- Cross-checking details with trusted databases or third-party verification services

4. **Record and Maintain Verification Results:**

All identification information, along with the methods and results of the verification process, will be documented and securely stored. This ensures transparency and supports ongoing compliance efforts.

Through this program, MY MAA MARKETS demonstrates its commitment to preventing financial crimes and ensuring that all customer relationships are built on a foundation of trust and regulatory compliance.

Notice to Customers

MY MAA MARKETS will provide clear notice to customers that, as required by applicable laws, it will request specific information to verify their identities.

This notice ensures that customers understand the purpose of the identification process and the legal obligations MY MAA MARKETS must fulfill to comply with Anti-Money Laundering (AML) regulations. By doing so, the company promotes transparency and fosters trust in its commitment to lawful and secure operations.

Know Your Customer (KYC)

At MY MAA MARKETS, establishing a thorough understanding of each client is a fundamental step in forming a business relationship. This **Know Your Customer (KYC)**

process enables the company to identify normal patterns of activity and detect any deviations that may indicate potential money laundering or terrorist financing.

Key Elements of KYC:

1. Understanding the Nature of Business Activities:

At the start of the relationship, MY MAA MARKETS gathers detailed information about the client's expected business activities. This includes:

- Income and occupation
- Source of wealth
- Trading habits
- Economic purpose of transactions

2. Establishing Personal Information:

As part of the KYC process, personal details such as nationality, date of birth, and residential address are collected. These details are evaluated to assess the potential risks of financial crime, including AML and Counter-Terrorist Financing (CTF).

3. Monitoring Business Relationships:

Once a relationship is established, regular business activities are assessed against the expected activity patterns of the customer. Any unexplained or unusual activities are investigated to identify possible suspicions of money laundering or terrorist financing.

4. Enhanced Due Diligence for High-Risk Transactions:

For transactions identified as high risk, MY MAA MARKETS may seek additional verification of the information provided by the client to ensure compliance and reduce risks.

By implementing robust KYC procedures, MY MAA MARKETS demonstrates its commitment to preventing financial crimes and maintaining trust and security in its business relationships.

Source of Funds

At MY MAA MARKETS, it is mandatory to ascertain and document the **source of funds** for every transaction. This process ensures transparency and helps mitigate risks associated with financial crimes, including money laundering and terrorist financing.

Key Requirements:

1. Identification of Payment Details:

The method of payment (e.g., cheque, bank transfer, or direct debit), its origin, and the individual or entity making the payment must be clearly identified.

2. **Retention of Documentation:**

Supporting documentation, such as copies of cheques, bank transfer receipts, or direct debit mandates, must be retained and securely stored in the client file.

3. **Ongoing Monitoring:**

All transactions will be monitored to ensure that the source of funds aligns with the client's profile and expected activity patterns. Any discrepancies or suspicious sources of funds will be investigated further.

By enforcing strict procedures for identifying and recording the source of funds, MY MAA MARKETS reinforces its commitment to financial transparency and compliance with Anti-Money Laundering (AML) regulations.

Identification

At MY MAA MARKETS, the identification process for customers, particularly private individuals, is based on the level of risk associated with the product or service being offered. The risk level is categorized as reduced risk, intermediate risk, or increased risk. For reduced risk and intermediate risk products, the following standard identification information is required:

1. **Full Name:**

The customer's complete legal name must be provided to ensure proper identification.

2. **Residential Address:**

The customer's residential address must be documented to verify their identity and ensure they reside at the provided location.

This identification process is crucial for verifying the legitimacy of customers and helps MY MAA MARKETS comply with regulatory requirements while minimizing the risk of financial crime. For products deemed high risk, additional identification and due diligence procedures may be applied.

Verification

At MY MAA MARKETS, verification of the information provided by customers is a crucial part of our anti-money laundering (AML) and compliance efforts. To ensure accuracy and reliability, we base the verification process on trusted and independent sources. These sources can include documents provided by the customer, electronically verified data, or a combination of both.

In cases where business is conducted face-to-face, we require that the customer presents original documents for verification. This helps us confirm the legitimacy of the customer's identity.

For individuals, documentary evidence that provides a high level of confidence typically includes government-issued identification, as these documents are more likely to have been properly checked by the relevant authorities. If government-issued identification is not available, alternative evidence may be considered, but it will be evaluated based on the level of risk.

When verifying an individual's identity using documents, we require the following:

1. Government-Issued Documents:

These should include:

- The customer's full name
- Their residential address

2. Photographic Government-Issued Identity Documents:

- A valid passport, or
- A national identity card

Alternatively, if a photographic identity document is not available, a non-photographic government-issued document is acceptable, provided it includes the customer's full name and is supported by a second document that contains:

- The customer's full name, and
- Their residential address

At MY MAA MARKETS, customers are not given a time limit for submitting their verification documents. However, the submission of these documents is a mandatory requirement for customers who wish to withdraw their funds.

Once the documents are received, MY MAA MARKETS commits to reviewing them within 24 hours to ensure compliance and facilitate the customer's access to their funds.

Monitoring and Reporting

At MY MAA MARKETS, transaction-based monitoring is an essential part of our commitment to preventing financial crime, including money laundering and terrorist financing. Monitoring will occur within the appropriate business units and is designed to detect and report any suspicious activity or unusual transactions.

We focus on monitoring transactions that meet certain criteria, including but not limited to:

- **Transactions Aggregating \$5,000 or More:** Any transaction that reaches or exceeds this threshold will be closely monitored.
- **Suspicious Transactions:** We will also monitor transactions where there is reason to suspect suspicious activity, regardless of the amount.

All identified transactions will be thoroughly documented and analyzed to ensure compliance with anti-money laundering (AML) regulations and to assess any potential risks. If necessary, reports will be filed with the relevant authorities as required by law.

Our approach ensures that all transactions are continuously monitored and any suspicious activity is appropriately reported, helping us maintain a secure and compliant environment for our customers.

Suspicious Activity

Suspicious activity in financial transactions can be a clear indication of potential money laundering or other illicit activities. These activities are commonly referred to as "red flags." When any of these red flags are detected, additional due diligence must be carried out before proceeding with the transaction. If, after conducting due diligence, no reasonable explanation can be found, the suspicious activity must be reported to the AML (Anti-Money Laundering) Compliance Committee for further action.

Here are some examples of red flags that suggest suspicious activity:

1. Customer Exhibits Unusual Concern About Compliance

- If a customer expresses excessive concern about the firm's compliance with government reporting requirements and the firm's AML policies, it could be a sign of suspicious intent. This concern may relate to their identity, business type, assets, or any reluctance to provide accurate or truthful information. Unusual or forged identification documents could also signal potential fraud or money laundering activities.

2. Transactions Lacking Business Sense

- If a customer is attempting to engage in transactions that lack a clear business purpose or investment strategy, it could indicate that the customer is trying to hide the true nature of the funds. This may include transactions that don't match the client's stated business activities or objectives, raising questions about their legitimacy.

3. False or Misleading Information About the Source of Funds

- When the customer provides false, misleading, or substantially incorrect information about the origin of their funds, it is a major red flag. A legitimate customer should be able to verify and document the sources of their funds easily. If there are discrepancies in this information, it could indicate fraudulent activity.

4. Refusal to Identify Source of Funds

- A refusal or failure to disclose a legitimate source of funds or assets is another key red flag. Legitimate customers should be willing to provide information to substantiate the sources of their income and wealth. If a customer is evasive or refuses to cooperate, it raises the suspicion that the funds may be illicit.

5. Questionable Background or Criminal Associations

- If a customer or someone associated with the customer has a questionable background, or if they are publicly reported in the media for criminal, civil, or regulatory violations, it can suggest involvement in illegal activities. This could indicate that the customer may be engaged in money laundering or other financial crimes.

6. Lack of Concern About Transaction Costs or Risks

- If a customer demonstrates no concern about risks, commissions, or other transaction costs, it could indicate that they are not concerned with the legitimacy of their transactions. This indifference is often a characteristic of individuals attempting to mask the origin of illicit funds.

7. Acting as an Agent for an Undisclosed Principal

- If a customer appears to be acting as an intermediary or agent for another person or entity but is unwilling to provide details or is evasive when questioned, it raises suspicions. Legitimate clients should be able to disclose the identities of all parties involved in a transaction without hesitation.

8. Inability to Describe Their Business or Industry

- When a customer has difficulty explaining the nature of their business or lacks basic knowledge of their industry, it can be a sign of a fabricated or nonexistent business. This lack of knowledge can indicate that the customer is trying to conceal their true intentions or is unfamiliar with the financial industry because they are not genuinely involved in business activities.

9. Frequent or Large Cash Deposits

- A customer who makes frequent or large deposits of cash, especially if they insist on dealing only in cash equivalents or ask for exemptions from the firm's normal cash deposit policies, could be attempting to launder money. These actions might be designed to avoid the traceability of funds and make it harder to detect the origin of illicit money.

10. Multiple Accounts and Unexplained Transfers

- If a customer holds multiple accounts under a single name or across different names and engages in large numbers of inter-account or third-party transfers without clear justification, it could indicate that the customer is attempting to hide the true ownership of funds or mask suspicious transactions.

11. Unexplained or Sudden Activity in Dormant Accounts

- If a previously inactive account suddenly shows extensive activity, especially if it had little or no prior transactions, this could indicate that the account is being used to launder money or conduct fraudulent transactions. A sudden influx of large or unexplained transactions should raise alarms.

12. Wire Transfers to Unrelated Third Parties

- A customer whose account regularly shows wire transfers to unrelated third parties without any apparent business reason is exhibiting suspicious activity. These transfers, especially when they are not consistent with the customer's stated business purpose, may suggest that the funds are being moved to conceal their origin.

13. Wire Transfers to or from High-Risk Countries

- If a customer's account shows wire transfers to or from countries known to be high-risk for money laundering or tax evasion, such as those with bank secrecy laws, this is a major red flag. These countries often provide a haven for illicit financial activities, and transfers to or from such locations require closer scrutiny.

14. Large or Frequent Wire Transfers Followed by Immediate Withdrawal

- If a customer makes large or frequent wire transfers, followed by an immediate withdrawal of funds using checks or debit cards, it could suggest that the purpose of the transaction is to move money quickly or obscure its origin, raising concerns about the legitimacy of the funds.

15. Funds Deposit Followed by Immediate Transfer to a Third Party

- If a customer makes a deposit into their account and immediately requests that the money be wired out or transferred to a third party, without any clear business purpose for doing so, it can be a sign of money laundering. This behavior may be an attempt to "clean" the funds and obscure the original source.

16. Purchase of Long-Term Investment, Followed by Quick Liquidation

- A customer who deposits funds for the purpose of purchasing long-term investments and then quickly requests liquidation and transfer of the proceeds might be attempting to disguise the true nature of the funds. Such rapid movement of money, especially when there is no clear business justification, could indicate suspicious activity.

17. Request to Avoid Normal Documentation Requirements

- If a customer requests that a transaction be processed in a manner that bypasses or avoids the firm's usual documentation requirements, it is a strong red flag. This could indicate that the customer is trying to prevent scrutiny and avoid detection of potentially illegal activity.

In summary, if any of these red flags are observed, the firm must conduct further due diligence and assess the situation. If no reasonable explanation is found, the activity must be reported to the appropriate authorities for further investigation. These measures ensure that MY MAA MARKETS adheres to the highest standards of compliance with anti-money laundering and counter-terrorist financing regulations.

Know Your Customer – The Basis for Recognising Suspicious Transactions

To detect and prevent suspicious activities, it is critical to understand the customer's business and personal activities. A suspicious transaction is typically one that is inconsistent with the customer's known, legitimate business or personal activities, or it may deviate from the normal transactions associated with that type of customer. Therefore, the foundation for identifying suspicious activities begins with thorough knowledge of the customer's typical business or personal patterns.

Here are the key questions to consider when determining whether an established customer's transaction might be suspicious:

- 1. Is the Size of the Transaction Consistent with the Normal Activities of the Customer?**
 - Transactions that are significantly larger or smaller than usual may raise concerns. A sudden and unexplained large transfer of funds, especially if it is out of proportion to the customer's usual transaction volume, can be a warning sign. On the other hand, an unusually small or frequent transaction that deviates from regular activity could also be suspicious.
- 2. Is the Transaction Rational in the Context of the Customer's Business or Personal Activities?**
 - For each transaction, it is important to assess whether it makes sense within the context of the customer's known activities. If the transaction is unrelated to the customer's usual business operations or personal spending habits, or if it is not consistent with their financial behavior, it could be considered suspicious. For example, a business customer who typically makes small payments for supplies suddenly making a large, one-off transfer to an overseas account could be a red flag.
- 3. Has the Pattern of Transactions Conducted by the Customer Changed?**

- A noticeable change in the customer's transaction patterns is a significant indicator that something might be amiss. This includes changes in the frequency, amount, or type of transactions. If a customer who usually conducts low-value transactions suddenly begins making high-value transfers or changes their usual methods of conducting business, it may suggest that they are trying to conceal the purpose or origin of the funds.

By constantly evaluating these questions and remaining vigilant for any unusual activity, MY MAA MARKETS can better identify suspicious transactions and mitigate potential risks. This proactive approach to understanding customer behavior is a key aspect of maintaining a robust Anti-Money Laundering (AML) and Know Your Customer (KYC) process.

Suspicious Scenarios: Identifying Red Flags in Transactions

When dealing with customers, certain behaviors or circumstances should raise concerns and prompt further investigation. These situations could indicate that a transaction is suspicious or could potentially be linked to money laundering or other illegal activities. Below are some key scenarios that should trigger suspicion at MY MAA MARKETS:

1. Clients Who Are Reluctant to Provide Proof of Identity

A customer who is unwilling or hesitant to provide necessary proof of identity, such as government-issued identification or address verification, should be considered suspicious. Legitimate clients will usually have no issue in providing this information. Reluctance to share these details can be an attempt to conceal one's true identity or intentions. This could indicate a higher risk of money laundering or fraudulent activity.

2. Clients Who Place Undue Reliance on an Introducer

If a client heavily depends on an intermediary or introducer to handle most of the dealings, they may be trying to avoid providing a true picture of their identity or business. It could suggest that the introducer is being used as a shield to mask illicit activities or to circumvent proper KYC (Know Your Customer) processes. This should be considered a potential red flag, and further investigation is necessary to ensure transparency.

3. Requests for Cash-Related Business

When a client requests information about conducting business with cash, such as asking whether investments can be made in cash or suggesting that funds might be available in cash for investment, it should raise suspicion. Cash transactions are harder to trace and can be used to launder money or evade regulations. Any suggestion or attempt to involve cash in business transactions should be carefully monitored and assessed.

4. Unclear Source of Funds for Investment

If the origin of the funds used for investment is not clear, it becomes difficult to determine if the money is legitimate or acquired through unlawful means. A legitimate

client should be able to clearly explain where their funds are coming from, whether it's from earnings, savings, or other legal sources. If the source is vague or impossible to trace, it may indicate the presence of suspicious activity.

5. Magnitude of Available Funds Appears Inconsistent with the Client's Circumstances

A client with a seemingly modest background—such as a student, young person, or someone with limited financial means—who suddenly has large amounts of money to invest could raise concerns. If the available funds appear disproportionate to the client's known circumstances, there may be an underlying issue with the legitimacy of those funds. A deeper investigation into the source of wealth is necessary to assess the risk.

6. Irregular or Illogical Transaction in the Context of the Client's Business or Personal Activities

If a transaction does not make sense in relation to the client's typical business or personal activities, it could be suspicious. For example, a person who typically operates in one industry suddenly engaging in transactions that are out of character or unrelated to their usual operations may be attempting to disguise the true nature of their activities. Particular attention should be paid if the client changes their usual method of dealing with the firm without a reasonable explanation.

7. Changes in the Pattern of Transactions

A sudden or unexplained change in the client's transaction behavior should be considered suspicious. If the volume or type of transactions suddenly increases, becomes more frequent, or deviates significantly from their usual pattern, this could indicate an attempt to move illicit funds or conduct illegal activities. It is important to monitor and assess any deviations from normal transaction patterns.

8. International Transactions with No Apparent Reason

If a client is conducting international transactions that do not align with their known business operations or personal circumstances, it should raise concerns. For example, if funds are being sent to or received from a country with a high risk of money laundering or financial crime, and there is no legitimate explanation for this, it may indicate suspicious activity. It is important to assess why the client is involved in transactions with particular countries and whether their business activities justify such international dealings.

9. Clients Who Are Unwilling to Provide Normal Personal or Financial Information

A client who is unwilling to provide basic personal or financial information without a valid reason should be treated with suspicion. This could be an attempt to hide illegal activities or a lack of transparency. While some clients may have legitimate reasons for distance relationships, in most cases, reluctance to share necessary information is a red flag. Cumulative issues—rather than isolated instances—should be the basis for suspicion.

10. Persuasive Arguments with No Clear Justification

Money launderers often provide seemingly reasonable explanations for their

transactions, attempting to convince you that there is no cause for concern. These explanations should be scrutinized closely. Any transaction that raises doubts or lacks clear justification should be questioned. A suspicious client will often try to justify their actions with persuasive but ultimately unclear or misleading reasoning.

In all of these scenarios, it is crucial to perform thorough due diligence and assess the potential risks involved. If any of the above red flags are observed, MY MAA MARKETS should take appropriate steps to investigate further and, if necessary, report the suspicious activity to the relevant authorities, such as the AML Compliance Committee. By maintaining vigilance and adhering to AML (Anti-Money Laundering) regulations, MY MAA MARKETS can help prevent financial crimes and protect its operations from being exploited for illegal purposes.

Reporting a Suspicion at MY MAA MARKETS

At MY MAA MARKETS, it is critical to take immediate action if any suspicion arises regarding a client or anyone they represent engaging in activities that could involve the proceeds of criminal activity, including money laundering or fraud. Any suspicion must be reported as soon as it is identified, and this process should be done in writing for documentation and compliance purposes.

Here are the key steps and points to consider when reporting suspicious activity:

1. Immediate Reporting of Suspicion

Whenever there is a suspicion that a client or a third party is involved in a transaction related to the proceeds of a crime, it must be reported without delay. This is a mandatory step to ensure compliance with anti-money laundering (AML) and counter-terrorist financing (CTF) regulations. The report should be made as soon as it is practically possible after identifying the suspicious activity. This helps to mitigate the risks associated with potential illegal transactions.

2. Written Reporting

The suspicion must be reported in writing, whether it is an internal communication within the firm or to the appropriate authorities. Written reports are essential because they serve as formal documentation of the concern, which can be referred to later if necessary for investigations or legal purposes. This process ensures that there is a clear, recorded trail of the suspicion and any subsequent actions taken.

3. Internal Reports

It is important to note that internal reports must be made, even if no business was conducted or is intended to be conducted. This means that the mere suspicion of criminal activity or the proceeds of crime is enough to trigger a report within MY MAA MARKETS. The internal compliance team must be alerted, and the situation should be investigated thoroughly. This

helps to establish a proactive approach in detecting and preventing illicit activities, regardless of whether a transaction is completed or not.

4. Content of the Report

The internal report should contain clear details regarding the transaction or client behavior that triggered suspicion. This may include:

- **Client Information:** Basic details of the client, such as their identity, background, and business activities.
- **Transaction Details:** Specifics of the transaction in question, such as the amount, date, method of payment, and recipient of the funds.
- **Reason for Suspicion:** A clear explanation of why the transaction is considered suspicious, referencing any red flags or inconsistencies with the client's normal behavior, business practices, or source of funds.
- **Supporting Documentation:** Any relevant documents, such as transaction records, communication with the client, or any other evidence that supports the suspicion.

5. Review and Action

Once the report is made, it should be reviewed by the designated compliance team or AML officers within the firm. The team will assess the report, investigate the matter further if necessary, and decide on the appropriate course of action. This could include additional checks, requesting more information from the client, or reporting the suspicion to the relevant financial intelligence unit (FIU) or law enforcement authorities.

6. Confidentiality

It is crucial that all reporting of suspicious activity is conducted in strict confidence. The identity of the reporting individual and the details of the investigation must not be disclosed to anyone outside the designated team. This is to ensure that no interference occurs in the investigation and to protect the privacy of individuals involved.

7. Ongoing Monitoring

After the suspicion is reported, MY MAA MARKETS should continue monitoring the client's transactions. If the suspicious behavior continues or escalates, additional reports may be necessary. Ongoing vigilance is required to ensure that no further illegal activity takes place under the firm's watch.

8. No Retrospective Transactions

Even if a transaction is not completed, if it was found to be suspicious, the report must be made. This ensures that all potentially illicit activities, regardless of whether they result in actual business or financial transactions, are documented and addressed. This is a key part of maintaining robust anti-money laundering controls and demonstrating a commitment to preventing criminal activities.

9. Legal Protection

It is important to note that individuals who report suspicious activity in good faith are legally protected from liability. Reporting suspected illegal activity in accordance with MY MAA MARKETS' procedures ensures compliance with relevant laws and provides protection to employees from any potential repercussions for doing so.

In conclusion, at MY MAA MARKETS, any suspicion of criminal activity, especially involving the proceeds of crime, must be reported immediately and in writing. This proactive approach to monitoring, identifying, and reporting suspicious activity helps the firm stay compliant with AML regulations and protects the integrity of the financial system. By ensuring that all reports are made regardless of whether a transaction was completed, we contribute to preventing financial crime and safeguarding our operations.

Investigation Process at MY MAA MARKETS

Upon receiving a report of suspicious activity, MY MAA MARKETS follows a strict investigation process to determine whether the transaction or activity in question involves proceeds from criminal activity and whether it warrants reporting to the relevant law enforcement or regulatory authorities. The steps involved in this investigation are detailed below:

1. Notification to the AML Compliance Committee

Once a suspicion is reported, it is immediately brought to the attention of the Anti-Money Laundering (AML) Compliance Committee. This committee is responsible for overseeing all AML-related concerns and ensuring compliance with the applicable laws and regulations. The notification acts as the starting point for an in-depth investigation into the matter.

2. Commencement of Investigation

The AML Compliance Committee will initiate a thorough investigation to determine whether the suspicious activity requires a report to law enforcement or regulatory bodies. The investigation process involves a detailed review of all available information related to the suspected activity.

3. Review of Available Information

The investigation will encompass the review of various pieces of information related to the customer and their transactions. This may include but is not limited to:

- **Payment History:** Analyzing the customer's payment records to identify any irregularities or suspicious patterns in their transactions.
- **Customer Identification Details:** Reviewing the customer's identity details, such as their birth date, address, and other personal information, to confirm their authenticity and legitimacy.

- **Transaction Records:** Examining the transaction history for any inconsistencies, unusual amounts, or patterns that do not align with the customer's known business or personal activities.

4. Determining the Need for a Suspicious Activity Report (SAR)

If the results of the investigation indicate that the transaction or activity in question is indeed suspicious and may involve illegal activities, the investigation team will recommend filing a Suspicious Activity Report (SAR) with the relevant law enforcement or regulatory agency. This is a critical step in complying with anti-money laundering regulations, as it helps authorities take further action if necessary.

5. Filing the SAR

The AML Compliance Committee holds the responsibility for submitting the SAR to the appropriate law enforcement or regulatory agency. The decision to file the SAR is based on the findings of the investigation, and the filing ensures that the potential criminal activity is formally reported to the authorities for further investigation or action.

6. Confidentiality of Investigation Results

It is essential to maintain the confidentiality of the investigation throughout the process. The results of the investigation should not be disclosed to anyone outside the AML Compliance Committee or the authorized personnel involved in the investigation. This ensures that the process remains protected from interference and that sensitive information is not leaked.

- **Restricted Disclosure:** Under no circumstances should the results of an investigation, any concerns regarding money laundering, or details of a SAR filing be shared with the customer or any other individual, including family members of employees or agents involved in the investigation. This prevents tipping off the person under investigation and maintains the integrity of the process.

7. Internal Communication and Need to Know Basis

Only those individuals who have a legitimate need to know should be privy to the details of the investigation. This includes the AML Compliance Committee, authorized staff members, and any other individuals directly involved in the investigation process. All communication related to the investigation must be conducted with the highest level of discretion.

8. No Disclosure to the Subject of the Investigation

At no point should the subject of the investigation (i.e., the customer or third party suspected of money laundering) be informed of the investigation, the potential SAR filing, or any concerns about their activities. This is critical to avoid alerting the subject, which could lead to them attempting to cover up their activities, destroy evidence, or otherwise interfere with the investigation.

9. Legal and Compliance Responsibility

The responsibility for ensuring that all steps in the investigation, from notification to potential SAR filing, are completed correctly rests with the AML Compliance Committee. This committee ensures compliance with all legal and regulatory requirements and guarantees that any necessary filings are made in accordance with the law.

Conclusion:

The investigation process at MY MAA MARKETS is designed to ensure a thorough and confidential review of suspicious activities, while complying with all regulatory requirements. By following these steps, the company maintains a proactive stance in combating money laundering and financial crime, while ensuring that all sensitive information remains confidential and protected from unauthorized disclosure. This rigorous process helps safeguard the integrity of the financial system and ensures that MY MAA MARKETS complies with all anti-money laundering laws and regulations.

Freezing of Accounts at MY MAA MARKETS

At MY MAA MARKETS, freezing accounts is a critical step in safeguarding the integrity of our operations and preventing criminal activities such as money laundering and fraud. When there is a suspicion or evidence that the funds in an account are linked to criminal activity or fraudulent instructions, the account must be frozen immediately to prevent further misuse of the funds. Below is an explanation of the process and rationale behind freezing accounts at MY MAA MARKETS:

1. Funds Derived from Criminal Activity

If we have clear evidence or reasonable suspicion that the funds in an account are derived from criminal activity, such as money laundering or terrorist financing, the account will be frozen. This is done to prevent illicit funds from being used within the financial system, ensuring that the company and its clients are protected from any potential legal or regulatory risks. Freezing the account helps to secure the illicit funds and prevents further transactions that could perpetuate criminal activities.

2. Funds from Fraudulent Instructions

In cases where it is discovered that the funds in an account have originated from fraudulent instructions, the account must be frozen to avoid any further fraudulent transactions. Fraudulent instructions could involve misleading or false information provided by the account holder, or transactions initiated with the intent to deceive the system. By freezing the account, MY MAA MARKETS ensures that no additional funds are transferred or withdrawn based on fraudulent activities, thus protecting the integrity of our operations.

3. Account Holder's Involvement in Fraudulent Activity

If there is a reasonable belief that the account holder may be involved in fraudulent activity, it is necessary to freeze the account to prevent further fraudulent actions. This could include situations where the account holder is believed to be knowingly participating in or facilitating

fraudulent transactions. If the investigation shows that the individual is actively involved in illegal activities, freezing the account will help mitigate any additional financial damage and protect the business from compliance violations.

4. Process for Freezing Accounts

When suspicious activity is detected, the AML (Anti-Money Laundering) Compliance Committee at MY MAA MARKETS will initiate the process to freeze the account. This includes:

- **Detection of Suspicious Activity:** Identifying transactions or patterns of activity that raise concerns about criminal activity or fraud.
- **Investigation:** A thorough review of the account's transactions and the customer's background to verify the legitimacy of the funds.
- **Decision to Freeze:** If the investigation confirms that the account is linked to criminal or fraudulent activity, the account will be frozen immediately to prevent further use of the funds.
- **Notification:** The account holder may be informed about the freeze unless it would compromise an ongoing investigation.

5. Regulatory Compliance

Freezing accounts is a key part of MY MAA MARKETS' commitment to complying with anti-money laundering (AML) regulations, financial crime prevention laws, and industry best practices. By freezing accounts linked to criminal or fraudulent activities, the firm ensures that it adheres to the relevant regulatory frameworks and prevents any violations that could damage the firm's reputation or lead to legal consequences.

6. Confidentiality and Legal Protection

During the process of freezing an account, strict confidentiality is maintained. Information related to the account freeze, the suspected fraudulent activities, and the investigation is shared only with authorized personnel within MY MAA MARKETS who have a legitimate need to know. This ensures that the process is protected and prevents any leaks of sensitive information that could affect the investigation or the firm's compliance obligations.

7. Releasing the Freeze

The freeze on an account will remain in place until the investigation is complete. If the investigation reveals that the funds are legitimate and there are no indications of criminal or fraudulent activity, the freeze will be lifted, and the account holder will be notified. However, if the funds are confirmed to be linked to criminal activity or fraud, further legal actions will be pursued, and the freeze will remain in place to protect the interests of the firm and its clients.

Conclusion

Freezing accounts at MY MAA MARKETS is a necessary measure to protect against criminal activities, fraud, and money laundering. It is part of our commitment to ensuring that all funds

transacted through the firm are legitimate and that we comply with all regulatory requirements. By freezing accounts linked to criminal or fraudulent activities, we prevent further misuse of funds, safeguard our operations, and maintain the trust of our clients. The process is carried out with confidentiality, thorough investigation, and in compliance with all applicable laws.