

# AML POLICY

Quantix FS Limited

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## 1.0 Introduction

Quantix FS Limited is committed to the highest standards of Anti-Money Laundering (AML). The members of the Management Board and all employees are required to adhere to these standards to protect Quantix and its reputation from being misused for money laundering and/or terrorist financing or other illegal purposes.

Quantix will examine its AML and AFC strategies, goals and objectives on an ongoing basis and maintain an effective program.

Quantix has implemented clear rules and regulations detailed in the AML and operations procedure manuals and which must be complied with by all Quantix staff.

## 1.1 Policies and Procedures

Quantix has developed a clear set of policies and procedures outlining its general AML standards and principles. Detailed documents ensure that these standards are implemented into day-to-day business.

All policies and policy-related documents are published on a global policy platform so they can be accessed by all staff at any time. They are subject to an annual review cycle to ensure their conformity with AML regulations.

## 1.2 Prohibited Business Relationships

Quantix must refuse to open an account/enter into a relationship or has to close an existing account/terminate a relationship, if the company cannot form a reasonable belief that it knows the true identity of the client and/or UBOs and/or the nature of business or formal requirements concerning the identification of the client and/or UBOs are not met. In particular, the company will not

- a) Accept assets that are known or suspected to be the proceeds of criminal activity
- b) Enter into/maintain business relationships with individuals or entities known or suspected to be a terrorist or a criminal organisation or member of such or listed on sanction lists
- c) Maintain anonymous accounts, accounts for shell banks or pay-through accounts
- d) Enter into relationships with clients operating in prohibited industries

## 1.3 Research and Filing of Suspicious Activity Reports (SARs)/Suspicious Transaction Reports (STRs)

Suspicious activities must be properly handled and escalated internally and to FIU. Regular AML training ensures that staff are reminded of their duty to timely report any suspicious activity to the AML Officer.

## 1.4 Management and Controls of AML Risk

Quantix maintains a comprehensive set of measures to identify, manage and control its AML risk. These measures are

- a) Controls
- b) A robust and strict KYC program
- c) A training and awareness program for Quantix staff
- d) Processes to ensure staff reliability

### **a) Controls**

Adherence to the group-wide AML/AFC program needs to be reviewed regularly to ensure that the Company's efforts are successful. The Compliance Manager/AML Officer is obliged to conduct appropriate controls.

### **b) KYC Program**

Quantix has implemented a strict KYC program to ensure all kinds of customers (natural or legal persons or legal structures, correspondent banks) are subject to adequate identification, risk rating and monitoring measures. This program has been implemented globally and throughout all business divisions

KYC includes not only knowing the clients and entities the Bank deals with (either as a single transaction or ongoing relationship), or renders services to, but also the Ultimate Beneficial Owners (UBOs), Legal Representatives and Authorised Signatories as appropriate.

The program includes strict identification requirements, name screening procedures and the ongoing monitoring and regular review of all existing business relationships.

Special safeguards are implemented for business relationships with politically exposed persons (PEPs) and clients from countries or industries deemed high risk.

### **c) Training Program**

Quantix implements a comprehensive AML/AFC training program to ensure that all staff, in particular individuals responsible for transaction processing and/or initiating and/or establishing business relationships, undergo AML awareness training.

The training is tailored to the business to ensure that staff are aware of different possible patterns and techniques of money laundering which may occur in their everyday business. Training also covers the general duties arising from applicable external (legal and regulatory), internal requirements and the resulting individual duties which must be adhered to in everyday business as well as typologies to recognise money laundering or financial crime activities.

### **1.5 Record Retention**

All data obtained according to client identification and AML security measures must be documented. Records must be kept for a minimum of 7 years, notwithstanding potentially longer retention periods under local civil or commercial law.