

ANTI-MONEY LAUNDERING (AML) POLICY

Zara Multi Traders is obliged to follow certain requirements as set out by the local regulator for preventing and suppressing money laundering activities, which obliges the Company to follow strict Anti-Money Laundering (AML) and Counter Terrorism Financing procedures while also requires the Company to obtain certain verification information as well as documentation.

The Company determines the identity of the beneficial ownership of all its clients' accounts and does not open or maintain such accounts, unless it is satisfied of this requirement, as stipulated in the AML Act and the legislative requirements. It has established procedures to obtain appropriate evidence of client identity, and maintains adequate records of client identity and transactions involved in such a manner as to assist, if necessary, in the investigation of criminal offences.

The Company has in place policies and procedures to identify and avoid money laundering transactions and to ensure compliance with the requirements of any relevant legislation issued by its regulator.

The Company is vigilant in ensuring the prevention of its involvement or misuse in money laundering activities, and is not knowingly accepting assets or enters into business relationships where there is reasonable cause to believe that such assets may have been acquired illegally or that they represent the proceeds of criminal activity.

The Company shall promptly report suspicious transactions relating to any account to the Supervisory Authority.

Where there is suspicion that the source of funds may be criminal or that a client may be involved in criminal activity, the Company shall follow established procedures for assessing the evidence and determining what course of action should be pursued.

The Company shall keep records of reports made by their staff and of reports made to the Supervisory Authority.

In accordance with the AML Act, the Company establishes the identity and verifies the identity of any customer of the Company by requiring the customer to produce an identification record or such other reliable, independent source document.

1. The Company shall:

- a) When establishing a business relationship, obtain information on the purpose and nature of the business relationship;

- b) If the transaction is conducted by a natural person, adequately identify and verify his identity including information relating to:
- The person's name and address;
 - The national identity card, social security document, passport or other applicable official identifying document;
- c) If the transaction is conducted by a legal entity, adequately identify the beneficial owner of such entity and take reasonable measures to identify and verify its ownership and control structure, including information relating to:
- The customer's name, legal form, head office address and identities of directors;
 - The principal owners and beneficiaries and control structure;
 - provisions regulating the power to bind the entity and to verify that any person purporting to act on behalf of the customer is so authorized, and identify those persons;
- d) Have appropriate risk management systems to determine if a customer or beneficial owner is a politically exposed person, and if so, shall:
- Adequately identify and verify his identity as set out in this section;
 - Obtain the approval of senior management before establishing a business relationship with the politically exposed person;
 - Take reasonable measures to establish the source of funds and source of property;
 - Conduct regular enhanced monitoring of the business relationship. Should you require any further information and/or have any questions about this document please direct your request and/or questions to compliance@zaramt.com.