AML/CFT Policy Ver 10.3

Anti Money Laundering and Combating Financing of Terrorism Policy

Multinet Trust Exchange LLP

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Document Approval Status

Document Title	**Anti- Money Laundering and Combating Financing of Terrorism Policies and Procedures**
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Document Revision History

Revision No.	Date of Revision	Reason for Implementation	Next Review Date
1	20.09.2020	Full Policy	
2	13.06.2021	CBUAE Notice No.3091/2021 on STR	
3	10.07.2021	CBUAE Notice No.3551/2021 on Guidance for TFS	
4	18.12.2021	Amended Chapter 16 of the standards for the regulations regarding Licensing and Monitoring of Exchange Business CBUAE Notice No.5737/2021 on Guidance for TFS CBUAE Guidance for Exchange house	
5	26.05.2022	Guidance for Licensed FI on Transaction Monitoring and Sanction Screening -4368/2021	
6	30.08.2022	CBUAE Notice No. 3157/2022 on PEP CBUAE Notice No. 3354/2022 on STR CBUAE Notice on Semi Annual MLRO Report	
7	22.03.2023	Sanctions Policy removed and created a separate policy. Penalties updated as per recent guidelines. Transaction Monitoring system updated as per new Software system Customer Risk Assessment methodology updated as per new system	
8	01.08.2023	CBUAE Notice No. 3599/2023 updated guidelines on Anti-Money Laundering and Combating the Financing of Terrorism and Illegal Organizations	
9	30.11.2024	CBUAE Notice no.1635/2023 Guidance for licensed financial institutions on risks related to virtual assets and virtual Asset service Providers (VASP). CBUAE Notice No. 1721/2024 Update the list of High-Risk Jurisdictions subject to a Call for Action and list of Jurisdictions under Increased Monitoring. Separate Policy created for Proliferation Financing. CBUAE Notice No. 3849/2024 on Agreed Upon Procedures (AUP).	Annually & whenever there are any changes
10	15.03.2025	Cash Intensive Business- Guidance for Licensed Financial Institutions providing services to Cash - Intensive Businesses	

10.1	15.03.2025	Process Of Conducting Public Domain Searches Under Paragraph 16.24 of standards - Separate Document created for the process of Public Domain Searches	Annually & whenever there are any changes
10.2	15.03.2025	Appointment of New Compliance Officer	
10.3	15.03.2025	Added international practices MENA FATF,EGMONT	Annually & whenever there are any changes

Table of Contents