**Chainwave Solutions Anti-Money Laundering (AML) Policy**

1. Introduction

Chainwave Solutions ("the Company") is committed to preventing money laundering, terrorist financing, and other illegal activities through the proper identification, management, and reporting of suspicious activities. This Anti-Money Laundering (AML) Policy outlines the Company's commitment to comply with all applicable laws, regulations, and guidelines to combat money laundering and terrorist financing.

2. Scope

This policy applies to all employees, officers, directors, contractors, and third-party agents of Chainwave Solutions. It covers all activities conducted by the Company, including but not limited to financial transactions, customer interactions, and reporting obligations.

3. Objectives

- To prevent the use of the Company’s products and services for money laundering, terrorist financing, or other criminal activities.

- To ensure compliance with all relevant AML laws and regulations.

- To protect the Company’s reputation by maintaining high standards of integrity and ethical conduct.

- To provide a framework for identifying, managing, and reporting suspicious activities.

4. AML Compliance Officer

The Company shall appoint an AML Compliance Officer who will be responsible for overseeing the implementation of this policy. The AML Compliance Officer's duties include:

- Developing and updating the AML policy.

- Ensuring that all employees are trained on AML requirements.

- Monitoring compliance with AML laws and regulations.

- Reporting any suspicious activity to the appropriate authorities.

- Maintaining records of all AML activities and reports.

5. Customer Due Diligence (CDD)

The Company will implement a Customer Due Diligence (CDD) program to ensure the identity of each customer is verified before establishing a business relationship. The CDD process includes:

- Collecting and verifying customer identification information (e.g., name, address, date of birth, and identification number).

- Identifying and verifying the beneficial owners of the account.

- Understanding the nature of the customer's business and the purpose of the account.

- Ongoing monitoring of customer transactions to detect unusual or suspicious activity.

6. Risk Assessment

The Company will conduct regular risk assessments to identify and mitigate potential AML risks. This includes assessing:

- The nature and complexity of the Company’s products and services.

- The geographical locations in which the Company operates.

- The types of customers and transactions involved.

- The potential for money laundering or terrorist financing within the Company’s operations.

7. Transaction Monitoring

The Company will implement robust transaction monitoring procedures to detect and report suspicious activities. These procedures include:

- Establishing thresholds for transaction alerts.

- Analyzing transactions for patterns that may indicate money laundering or terrorist financing.

- Investigating and documenting any suspicious activity.

8. Suspicious Activity Reporting (SAR)

The Company is required to report any suspicious activities to the relevant authorities. Employees must immediately notify the AML Compliance Officer if they detect or suspect any suspicious activity. The AML Compliance Officer will then determine if a Suspicious Activity Report (SAR) should be filed.

9. Record-Keeping

The Company will maintain records of all customer information, transaction details, and reports of suspicious activities for a minimum of five years. These records will be securely stored and readily accessible to the relevant authorities upon request.

10. Employee Training

All employees will receive regular training on AML regulations, the Company’s AML policy, and their responsibilities in preventing money laundering and terrorist financing. The training program will be updated regularly to reflect changes in laws and regulations.

11. Internal Controls and Audits

The Company will establish and maintain internal controls to ensure compliance with this policy. Regular audits will be conducted to evaluate the effectiveness of the AML program and identify areas for improvement.

12. Compliance with Sanctions

The Company will comply with all applicable sanctions programs, including those administered by the Office of Foreign Assets Control (OFAC) and other relevant authorities. The Company will screen customers and transactions against applicable sanctions lists and take appropriate action if a match is identified.

13. Reporting Violations

Any employee who becomes aware of a violation of this policy must report it immediately to the AML Compliance Officer. The Company prohibits retaliation against any employee who reports a violation in good faith.

14. Review and Revision of Policy

This AML policy will be reviewed and updated regularly to ensure its effectiveness and compliance with current laws and regulations. The AML Compliance Officer is responsible for initiating and overseeing the review process.

15. Conclusion

Chainwave Solutions is dedicated to maintaining the highest standards of compliance with AML laws and regulations. By adhering to this policy, the Company aims to prevent money laundering and terrorist financing, protect its reputation, and contribute to the integrity of the global financial system.

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Approval and Adoption

\*\*Awaiting Final Approval DRAFT ONLY

This AML Policy has been approved by the Board of Directors of Chainwave Solutions and is effective as of [Effective Date]. All employees, officers, directors, contractors, and third-party agents must comply with the terms of this policy.

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This policy should be reviewed and tailored to the specific requirements and operations of Chainwave Solutions, ensuring full compliance with relevant local and international regulations.