

Anti-Money Laundering (AML) and Sanctions Policy

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1. Policy Statement

NexaCore Solutions is committed to preventing its products or services from being used for money laundering, terrorist financing, or other illegal activities. We strictly comply with all applicable AML laws and international sanctions regimes (e.g., UN, US OFAC, EU, and local UAE/GCC sanctions).

2. Customer Due Diligence (CDD)

- **Required CDD:** Before onboarding any new client (especially Enterprise clients), the Sales and Legal teams must perform enhanced Customer Due Diligence (CDD).
- **KYC (Know Your Customer) Documentation:** Required documentation includes, but is not limited to, official company registration documents, list of directors, and identification of ultimate beneficial owners (UBOs) for private entities.
- **Enhanced Due Diligence (EDD):** EDD is mandatory for high-risk clients, including those operating in high-risk jurisdictions, politically exposed persons (PEPs), or clients paying via unusual methods.

3. Sanctions Compliance

- **Screening:** All prospective and existing clients, partners, and vendors must be screened against relevant international and local sanctions lists (e.g., OFAC SDN List, UNSC).
- **Prohibition:** NexaCore is strictly **prohibited** from engaging in any transaction, directly or indirectly, with any sanctioned entity, individual, or country, even if the transaction is otherwise legal.

4. Reporting Suspicious Activity

Any Employee who suspects that a client or transaction may involve money laundering or sanctions violations must immediately report the concern to the Compliance Officer.

- **Tipping Off:** Employees are strictly prohibited from informing the subject of a suspicious transaction report (STR) that a report has been or will be filed.
- **Record-Keeping:** All CDD records and transaction data must be retained for a minimum of **[7 years]** after the client relationship is terminated, as per UAE regulatory

requirements.