

## Anti-Money Laundering (AML) Compliance

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### 1. Introduction

This Anti-Money Laundering (AML) Compliance Document sets forth the policies and procedures adopted by "Roco Broker Ltd." providing services under the "Roco Broker" trademark to comply with applicable laws and regulations aimed at preventing money laundering and terrorist financing.

This document outlines our policies and procedures to comply with the relevant AML laws and regulations.

### 2. AML Policy Statement

Roco Broker Ltd. is committed to preventing the use of its services for money laundering or terrorist financing. We have implemented a comprehensive AML program designed to ensure compliance with the relevant laws and regulations, including the Bank Secrecy Act (BSA), the USA PATRIOT Act, and other applicable laws and regulations.

Our policy is to detect and prevent money laundering and terrorist financing through a robust AML compliance program that includes due diligence, continuous monitoring, and reporting of suspicious activities.

### 3. Customer Identification Program (CIP) or Know Your Customer (KYC) Procedures

- **Verification:** All new clients must provide valid identification documents. Acceptable forms of identification include government-issued IDs, passports, or other official documents.
- **Information Required:** We will collect and verify information including name, date of birth, and identification number for each client.
- **Risk Assessment:** Clients are assessed for risk level based on factors such as the nature of their business, transaction patterns, and geographic location.
- **Enhanced Due Diligence:** For customers considered high-risk, additional information will be gathered and verified.
- **Verification of Politically Exposed Person (PEP) Status:** We will screen users to verify whether they are Politically Exposed Persons (PEPs). This involves checking clients against relevant PEP databases and conducting enhanced due diligence for those identified as PEPs, including obtaining information on their source of wealth and the nature of their transactions.

## 4. Screening of Users and Transactions Against Sanctions Lists

We will conduct regular screening of all users and transactions against national and international sanctions lists, including, but not limited to, the Office of Foreign Assets Control (OFAC), United Nations, European Union, and any other relevant sanctions lists.

In the event of a match, we will take appropriate actions, including blocking transactions, freezing accounts, and reporting to the relevant authorities as required by law.

## 5. Monitoring and Reporting

- **Transaction Monitoring:** We continuously monitor transactions for suspicious activity using both automated and manual processes.
- **Suspicious Activity Reports (SARs):** Any suspicious activity identified during monitoring will be reported to the appropriate authorities through a Suspicious Activity Report (SAR).
- **Currency Transaction Reports (CTRs):** We will file Currency Transaction Reports (CTRs) for any transaction or series of transactions that exceed the reporting threshold.

## 6. Record Keeping

- **Documentation:** All records related to AML compliance will be retained for a minimum of five years.
- **Accessibility:** Records will be maintained in a manner that allows for prompt retrieval and review.
- **Data Security:** Records are stored securely and are accessible only to authorized personnel.

## 7. Training and Awareness

- **Employee Training:** All employees will receive regular training on AML laws, regulations, recognizing suspicious activities, and internal policies. Training will be provided annually and upon changes in regulations or internal policies.
- **Awareness Program:** Employees will be encouraged to report any suspicious activities and are assured of no reprisals for doing so.

## 8. Independent Audit & Review


- **Audit:** An independent review of the AML program will be conducted annually to assess its effectiveness and compliance with applicable laws and regulations.
- **Findings:** The findings of the independent review will be reported to senior management, and corrective actions will be taken if necessary.

## 9. Compliance Officer

- **Designation:** Our compliance officer has been designated as the AML Compliance Officer responsible for overseeing the implementation and enforcement of the AML program.
- **Responsibilities:** The Compliance Officer is responsible for ensuring that all AML policies and procedures are up-to-date and effectively implemented. The Compliance Officer oversees all aspects of the AML program, including training, monitoring, and reporting.

## 10. Client Education

- **Informative Resources:** We provide resources to educate clients about the risks of money laundering and the importance of compliance.
- **Customer Support:** Clients can reach out to our support team with any questions or concerns regarding our AML policies.

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