

ANTI-MONEY LAUNDERING (AML) COMPLIANCE POLICY

Anti-Money Laundering (AML) Compliance Policy

Zeronine Capital Ltd is fully committed to maintaining rigorous compliance standards and ensuring that our services are never used for money laundering, terrorist financing, or any form of illicit activity. Our Anti-Money Laundering (AML) framework aligns with global best practices, including the Financial Action Task Force (FATF) guidelines and the Basel Committee's Principles for combating financial crime.

Core Elements of Zeronine Capital Ltd AML Program

Our AML policy is structured around four essential pillars:

1. Internal Policies, Procedures, and Controls

We maintain clearly defined internal controls and compliance procedures to detect and prevent suspicious activity and maintain the integrity of our financial operations.

2. Appointment of a Compliance Officer

We have a dedicated Compliance Officer responsible for overseeing AML operations, ensuring adherence to applicable laws, and reporting to regulatory authorities as required.

3. Ongoing Staff Training

Our employees receive regular training to identify red flags and handle potentially suspicious activities in compliance with AML/CTF obligations.

4. Independent Compliance Review

We conduct internal audits and engage independent parties to review our AML procedures and recommend improvements.

Customer Due Diligence (CDD)

Zeronine Capital Ltd performs comprehensive due diligence on all customers, regardless of the account size or volume of activity, to ensure:

- All transactions are consistent with the customer's business or financial profile.
- The source of funds is legitimate and traceable.
- A risk-based approach is applied when onboarding clients and throughout the relationship lifecycle.

Record Retention & Confidentiality

To comply with internal compliance requirements, Zeronine Capital Ltd:

- Retains all customer identification data, transaction records, and communication logs for a minimum of five (5) years.
- Stores data securely using industry-standard encryption and access controls.
- Maintains strict confidentiality, disclosing information only when required by law or authorized authorities.

Independent Oversight

We ensure our AML program remains effective and current through:

- Periodic internal audits
- External compliance assessments

These reviews help reinforce accountability and transparency across all operations.

Know Your Customer (KYC) & Know Your Customer's Customer (KYCC)

Our robust identification and verification process applies to all clients, regardless of transaction size:

- Verification of government-issued identity documents
- Collection and analysis of risk profiles
- Ongoing monitoring of transaction patterns
- Additional checks for counterparties when applicable

Enhanced Due Diligence (EDD)

For clients or transactions considered high-risk, we apply EDD measures, including:

- Verification of the source of funds and the legitimacy of documents
- Scrutiny of the client's financial background and business operations
- Heightened monitoring, and in some cases, senior management approval for transactions

Sanctions Screening

Zeronine Capital Ltd conducts real-time screening of all clients and counterparties against global sanctions lists, including:

- UAE Central Bank
- UN Security Council (UNSC)
- Office of Foreign Assets Control (OFAC)
- Office of Financial Sanctions Implementation (OFSI)
- European Union (EU)
- UAE Supreme Council for National Security

This screening applies not only at onboarding but also continuously during the client relationship.

Transaction Monitoring

We employ automated and manual systems to detect and investigate unusual transaction behaviour. Our process includes:

- Real-time activity monitoring for patterns inconsistent with client profiles
- Escalation of suspicious transactions to the compliance team
- Thorough review and documentation of flagged incidents

Reporting Suspicious Transactions

All employees are trained to report any transaction or client behaviour that appears suspicious or unusual.

- Reports are reviewed internally by our Compliance Officer.
- When appropriate, reports are submitted to the Financial Intelligence Unit (FIU) in accordance with applicable laws.

Employee Training & Awareness

Zeronine Capital Ltd maintains a strong compliance culture through comprehensive training initiatives:

- All new employees receive AML/CTF training within their first 30 days.
- Annual refresher courses keep staff updated on new threats, policy changes, and compliance developments.
- Training content covers risk indicators, reporting procedures, and international compliance standards.