

ANTI-MONEY LAUNDERING AND KNOW YOUR CUSTOMER POLICY (SUMMARY)

Under the policy of COMMO T Co., Ltd. and its affiliates, (hereinafter “COMMO T”) to strictly prohibit and actively pursue the prevention of money laundering and any activities that facilitates money laundering and combating the financing of terrorism. This Policy sets standards for identification of customers in order to prevent the use of COMMO T products and services for money laundering and financing of terrorism purposes. COMMO T requires its officers, employees and its affiliates to adhere to these standards in preventing the use of its products and services for money laundering and financing of terrorism purposes, as well as, misused for money laundering, financing of terrorism or any other financial offense.

For the purposes of the Policy and in accordance to the Law on Anti-Money Laundering and Combating the Financing of Terrorism of the Kingdom of Cambodia, money laundering refer to (i) the conversion or transfer of property, knowing that such property is the proceeds of offence, for the purpose of concealing or disguising the illicit origin of the property or of helping any person who is involved in the commission of the offence to evade the legal consequences of his or her action; (ii) the concealment or disguise of the true nature, source, location, disposition, movement ownership of or rights with respect to property, knowing that such property is the proceeds of offences; (iii) the acquisition, possession or use of property, knowing that such property is the proceeds of offence; and (iv) participation in, and attempts to commit, aiding and forcing somebody to commit any of the acts defined; while financing of terrorism refer to the willful provision of financial or other services with the intention that such services be used or in the knowledge that they are or may be used, in full or in part, for the purpose of supporting terrorism, terrorist acts or terrorist organizations.

All new employees will receive Anti-Money Laundry training as part of the mandatory new-hire training program. While other applicable employees are also required to complete AML & KYC training annually. Therefore, each of COMMO T’s employees are well trained about the AML & KYC policy. Those who duties are associated with the provision of products and services of COMMO T and who directly or indirectly deals with the clientele of COMMO T, is expected to know the requirements of the applicable laws and regulations which affect his or her job responsibilities, and it shall be the affirmative duty of such employee to carry out these responsibilities at all times in a manner that complies with the requirements of the relevant laws and regulations. Moreover, the compliance team of the COMMO T will oversee to ensure the effective implementation and enforcement of the AML & KYC policy. It is the responsibility to supervise all aspects of COMMO T’s Anti-Money Laundering and Combating the Financing of Terrorism.

Each of the affiliates of the COMMO T is required to comply with the AML & KYC policy.

Any records of customer identification and records of transactions conducted by customers shall keep and maintain at the minimum period of time required by the Law on Anti-Money Laundering and Combating the Financing of Terrorism of the Kingdom of Cambodia, after the account has been closed or the business relations with the customer have ended.

For further information and understanding, please refer to the full version of our AML & KYC Policy document or reach out to us by info@commot.asia.

