

This policy, known herein as our AML Policy, includes preventing persons from using our company to:

- launder money, i.e. to conceal or disguise that money or other assets that are derived from crime or to conceal or disguise the true ownership or control of such money or assets;
- finance terrorists or terrorism, or
- engage in or advance any other criminal activity.
- we will report if we suspect, or have reason to suspect that a person is engaging in or attempting to engage in money laundering, terrorism financing, or any other criminal activity, or
- we will report if we suspect that any money or other assets under our control or offered to us are derived from crime or are to be used to finance terrorists or terrorism.

Each employee of our company will be held strictly responsible for implementing his or her duties.

Head of Compliance Function Designation and Duties

Our company has designated Mr. Ghazanfar Parwez as its **Head of Compliance Function (CO)**, with full responsibility for our company's AML compliance program.

Providing AML Information to Federal Law Enforcement Agencies

We will respond to **Financial Monitoring Unit (FMU)** request concerning customer / client accounts, and transactions by immediately searching our records to determine whether we maintain or have maintained any account for, or have engaged in any transaction with, each individual, entity or organization in the request.

Know Your Customer/Client (KYC) and Customer/Client Due Diligence (CDD) Program

We have a KYC/CDD policy in place.

Suspicious Transactions (ST)

The CO will report to the management any suspicious transaction(s) by completing a **Suspicious Transactions Report (STR)** immediately, and we will collect and maintain supporting documentation as required. If the management warrants that this is indeed a suspicious transaction, then the CO will file an STR no later than 30 calendar days after the date of the initial detection of the facts that constitute a basis for filing an STR.

AML Recordkeeping

The CO and his or her designee will be responsible for ensuring that AML records are maintained properly and that STRs are filed as required.

Clearing/Introducing Company Relationships

We do not have any clearing member or introducing company relationships.

Training Programs

We have a regular training program for all our employees.

Program to Test Independently our AML Program

The CO will check database of all transactions and will develop and test software models to identify ST.

Screening and Monitoring of Employee Conduct and Accounts

The CO will regularly check personal accounts of all employees on a regular basis.

Confidential Reporting of AML Non-Compliance

Employees will promptly report any potential violations of the company's AML compliance program to the CO, unless the violations implicate the CO, in which case the employee shall report to management. Such reports will be confidential, and the employee will suffer no retaliation for making them.

Additional Risk Areas

We will implement any additional areas of risk in our AML Policies.

Senior Management Approval

Senior management has approved this AML policy.