

## ANTI MONEY LAUNDERING POLICY

### 1. Purpose & Scope

This policy ensures that RA International and its affiliates comply with all applicable anti-money laundering (AML) and counter-terrorist financing (CTF) laws and regulations, including the UK Proceeds of Crime Act, U.S. Bank Secrecy Act, EU AML Directives, and relevant local laws (e.g., UAE regulations and DFSA rules).

We are committed to preventing the misuse of our operations, particularly in complex, high-risk geographies, for money laundering or illicit financial activities.

This policy applies to all directors, officers, employees, contractors, and third parties acting on behalf of RA International.

### 2. Key Definitions

- **Money laundering:** Concealing the origin of illicit funds to make them appear legitimate.
- **Suspicious activity:** Transactions that are inconsistent with a party's profile or raise doubts about legality (e.g., complex payment routing, large unexplained cash movements).
- **Politically Exposed Persons (PEPs):** Individuals holding prominent public functions and their close associates.

### 3. AML Risk Assessment

RA International performs periodic risk assessments to evaluate vulnerabilities based on:

- Geographic exposure (e.g., high-risk jurisdictions, sanctioned territories)
- Client types (e.g., NGOs, government entities, PEPs)
- Nature of services (e.g., construction, logistics, cash-intensive operations)

Findings are documented, rated, and used to determine the level of due diligence and monitoring required.

### 4. Customer and Third-Party Due Diligence (CDD & EDD)

RA International conducts Due Diligence (DD) before engaging with any third party. This includes:

- Verification of identity and registration documents
- Identification of beneficial owners
- Understanding the nature and purpose of the relationship
- Screening against global sanctions and watchlists

Enhanced Due Diligence (EDD) is triggered where higher risk is identified, including:

- Involvement of PEPs
- Operations in sanctioned/high-risk countries
- Use of complex structures or offshore accounts
- Inconsistent or unverifiable financial information

High-risk relationships require senior management approval and enhanced ongoing monitoring.

## 5. Transaction Monitoring & Reporting

All financial transactions are monitored for unusual or suspicious activity. Particular attention is given to:

- Irregular payment patterns or unexplained wire transfers
- Transactions involving high-risk jurisdictions
- Attempts to structure transactions to avoid reporting thresholds

Employees must report suspicious activity immediately to the Compliance Officer / CFO.

## 6. Role of the Compliance Officer

RA International's Compliance Officer also serves as the Money Laundering Reporting Officer (MLRO), providing a unified oversight function for all compliance-related risks.

Responsibilities include:

- Advising on AML and sanctions compliance requirements
- Reviewing and escalating potential suspicious activity
- Ensuring implementation of risk-based controls across functions
- Maintaining up-to-date policies, tools, and screening systems

The Compliance Officer acts independently and has full authority and access to all necessary information across the business.

## 7. Training & Awareness

All employees and relevant third parties must complete AML training:

- At onboarding and annually thereafter
- With tailored sessions for high-risk roles (e.g., finance, procurement, supplier onboarding)

- Training covers DD, EDD, red flags, sanctions screening, and escalation procedures

Completion is tracked and monitored by the Compliance function.

## **8. Record-Keeping**

RA International retains AML-related documentation (e.g., DD records, training logs, audit results) for a minimum of five (5) years or longer, where local laws require. All records must be easily retrievable and securely stored.

## **9. Independent Review**

An independent audit of the AML program is conducted at least annually to:

- Assess design and operational effectiveness of controls
- Review transaction monitoring and reporting mechanisms
- Verify staff compliance and training participation
- Identify areas for improvement or emerging risks

Findings are reported to the Executive Committee and Board, and corrective actions are tracked to closure.

## **10. Sanctions Compliance**

RA International screens all counterparties and transactions against major sanctions regimes, including:

- United Nations
- European Union
- Office of Foreign Assets Control (OFAC)
- UK HM Treasury
- UAE and DFSA lists

Engaging with sanctioned parties is strictly prohibited unless authorized by a competent authority.

## **11. Disciplinary Action**

Failure to comply with this AML Policy or related laws may result in disciplinary measures, including suspension, termination, or legal action.

Zero tolerance applies to attempts to conceal suspicious activity or obstruct AML investigations.

## **12. Policy Governance & Review**



This policy is approved by RA International’s Executive Management Team (EMT) and reviewed annually by the Compliance Officer / CFO.

Updates are made to reflect regulatory developments, operational changes, and audit findings.

A handwritten signature in blue ink, appearing to read 'Narfeldt', enclosed within a blue oval.

Soraya Narfeldt  
CEO

Policy Implementation/ Review Date	Next Policy Review Date
January-2026	January-2027

1. Appendix A – AML Controls Checklist

This checklist is designed to support implementation, internal monitoring, and audit of the Anti–Money Laundering (AML) policy at RA International. Each item should be reviewed regularly and documented accordingly.

Control Area	Checklist Item	Status (✓/ X)	Notes/ Action Required
KYC Procedures	Verified identity documents collected for all third parties		
	Legal status and beneficial ownership confirmed		
	Third-party risk rating assigned (low/med/high)		
	EDD conducted for PEPs and high-risk cases		
Sanctions Screening	Initial screening against UN, EU, OFAC, UK, DFSA, UAE lists		
	Ongoing periodic re-screening in place		
Onboarding Controls	Due diligence process risk-based and documented		
Transaction Monitoring	Red flag indicators checklist used for payment reviews		
	Finance/procurement trained to detect suspicious patterns		
	Payments to high-risk/offshore accounts reviewed by MLRO		
Training & Awareness	Annual AML training completed for all staff		
	Targeted training held for high-risk roles (Finance, Procurement, Field Ops)		
	Training records tracked by Compliance		
Record Retention	DD and EDD files retained for minimum 5 years		
	Training, and screening logs retained securely		
Vendor/Contract Controls	AML clauses included in standard contracts		
	Compliance approval obtained before onboarding vendors		
	Vendor files periodically reviewed		
Audit & Review	Periodic sample reviews conducted (annually)		
	AML controls included in audit plans		
	Audit findings tracked to resolution		
Whistleblower Mechanism	Anonymous reporting channel active and promoted		
	Anti-retaliation protection communicated and enforced		