

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 black ink, appearing to read 'Soraya Narfeldt', written over a horizontal line.

Soraya Narfeldt
CEO

| Policy Implementation/ Review Date | Next Policy Review Date |
|---------------------------------------|-------------------------|
| July-2025 | June-2026 |

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 | | |

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|-------------------------|---|--|--|
| 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 | | |